In the Supreme Court of the United States

PRESIDENT DONALD J. TRUMP,

v.

E. JEAN CARROLL,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR WRIT OF CERTIORARI of President Donald J. Trump contains 8,665 words, excluding those parts exempted by Supreme Court Rule 33.1(d).

Dated: November 10, 2025

/s/ Justin D. Smith
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