

No. 25-573

# 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 REPLY BRIEF FOR PETITIONER of President Donald J. Trump contains 2,999 words, excluding those parts exempted by Supreme Court Rule 33.1(d).

Dated: January 28, 2026

*/s/ Justin D. Smith*  
Justin D. Smith  
*Counsel of Record*  
JAMES OTIS LAW GROUP, LLC  
530 Maryville Centre Drive  
Suite 230  
St. Louis, Missouri 63141  
(816) 678-2103  
Justin.Smith@james-otis.com  
*Counsel for President Donald J. Trump*