

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

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