

No. 25-774

IN THE
Supreme Court of the United States

ERIC TYRELL JOHNSON,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief For *Amicus Curiae* Pacific Legal Foundation in Support of Petitioner in *Johnson v. United States*, No. 25-774, complies with the word limitations, as it contains 5,411 words, excluding the words exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 2, 2026

/s/ David J. Feder
David J. Feder