

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-886

KENNETH GENALO, DIRECTOR OF THE NEW YORK FIELD
OFFICE OF U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, ET AL.,

Petitioners,

v.

KEISY G.M.,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Kwaku A. Akowuah, certify that the Brief of Amici Curiae Data And Policy Analysts in Support of Respondent in the foregoing case contains 2,880 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on September 8, 2026.

/s/ Kwaku A. Akowuah
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