

IN THE
Supreme Court of the United States

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

Petitioners,

v.

KEISY G.M.,

Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Mark C. Fleming, a member of the bar of this Court, certify that the accompanying Brief for the American Bar Association as Amicus Curiae in Support of Respondent contains 7,721 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on September 8, 2026.

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