

No. 25A312

In the

Supreme Court of the United States

DONALD J. TRUMP,
President of the United States, et al.,
Applicants,
v.

LISA D. COOK,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey P. DeSousa, counsel of record for Amici Curiae and a member of the Bar of this Court, certify that the Amici Curiae Brief in this case contains 17 pages (4,325 words), excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey P. DeSousa
Counsel of Record

September 25, 2025