CERTIFICATE OF COMPLIANCE

Case No. 25A312

33.1(d).

Caption: Donald J. Trump v. Lisa D. Cook, et al.

As required by Supreme Court Rule 37.4, I certify that the Brief of the American Civil Liberties Union, American Civil Liberties Union of D.C., and The Rutherford Institute as *Amici Curiae* in Support of Neither Party is 19 pages long, excluding the parts of the document that are exempted by Supreme Court Rule

As a member of the Bar of the Supreme Court of the United States, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 29, 2025.

Aditi Shah

Counsel of Record