

In The
Supreme Court of the United States

JAMES A. DELANIS,

Petitioner,

v.

BAKER, DONELSON, BEARMAN, CALDWELL &
BERKOWITZ, PC, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Anya Bidwell, counsel of record for amicus curiae and a member of the Bar of this Court, certify that the Brief for the Institute for Justice, Manhattan Institute, New Civil Liberties Alliance, and Advancing American Freedom, Inc. as Amici Curiae in Support of Petitioner in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that it complies with the word limit of Supreme Court Rule 33.1(g). It contains 5,796 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

AUGUST 6, 2026

/s/ Anya Bidwell

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