

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 26-

NIDAL AHMED WAKED HATUM,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Joshua J. Fougere, certify that the Petition for a Writ of Certiorari in the foregoing case contains 7,323 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/ Joshua J. Fougere
JOSHUA J. FOUGERE
SIDLEY AUSTIN LLP
1501 K Street, NW
Washington, DC 20005
(202) 736-8000
jfougere@sidley.com