No. _____

# In The Supreme Court of the United States

JOHN C. EASTMAN,

*Petitioner,*

*v.*

THE STATE BAR OF CALIFORNIA,

*Respondent.*

On Petition for Writ of Certiorari to the
Supreme Court of California

## CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for Petitioner John C. Eastman, pursuant to Rule 33.1(h), hereby certifies that the Petition for Writ of Certiorari complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Opinions Below and all material following the last word of the text of the conclusion), is 8965 words.

/s/ Jay Alan Sekulow
Jay Alan Sekulow

September 11, 2026