
In The Supreme Court of the United States

BRENNA BIRD, *Petitioner,*

v.

IOWA MIGRANT MOVEMENT FOR JUSTICE, *et al., Respondents.*

On a Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Eighth Circuit

CERTIFICATE OF SERVICE

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law & Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amicus Curiae of the American Center for Law & Justice in Support of Petitioners complies with the pertinent word limitation. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 4,430 words.

August 12, 2026

/s/ Jay Alan Sekulow
Jay Alan Sekulow