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August 21, 2026

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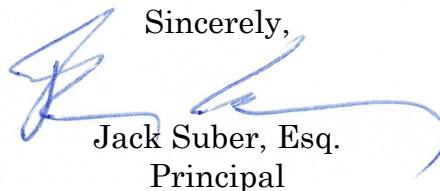
**RE NO. 26-98: PUBLIC INTEREST LEGAL FOUNDATION, INC. V. SCOTT T. NAGO,
CHIEF ELECTION OFFICER OF THE STATE OF HAWAII**

Dear Sir or Madam:

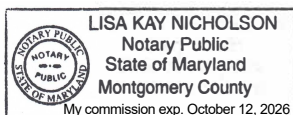
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Judicial Watch, Inc. referenced above contains **3,553** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 21st day of August 2026.

