

No. 19-1056
IN THE
Supreme Court of the United States

KRISTI NOEM, Governor of South Dakota, et al.,
Petitioners,

v.

FLANDREAU SANTEE SIOUX TRIBE,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,981 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 April 20, 2020.

/s/Adam G. Unikowsky
Adam G. Unikowsky