

No. 23-74

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**In the Supreme Court of the United States**

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UNITED STATES, PETITIONER

*v.*

JONATHAN THOMAS SKRMETTI, ATTORNEY GENERAL AND  
REPORTER FOR TENNESSEE, ET AL., RESPONDENTS

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*ON WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT*

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**CERTIFICATE OF COMPLIANCE**

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I certify that the amicus brief contains 7,121 words, excluding the parts exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that this certification is true.

Executed on October 11, 2024.

/s/ Jonathan F. Mitchell  
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