## CERTIFICATE OF COMPLIANCE

No. 23-828

DOUGLAS B. MOYLAN, ATTORNEY GENERAL OF GUAM,

Petitioner,

v.

LOURDES LEON GUERRERO, GOVERNOR OF GUAM,

Respondent.

As required by Supreme Court Rule 33.l(h), I certify that the Brief in Opposition contains 1,876 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.l(d).

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

Executed on July 23, 2024,

Michael F. Phillips

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