

---

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

---

MIRIAM FULD, ET AL., *Petitioners*,  
*v.*  
PALESTINE LIBERATION ORGANIZATION, ET AL.,

---

UNITED STATES OF AMERICA, *Petitioner*,  
*v.*  
PALESTINE LIBERATION ORGANIZATION, ET AL.,

---

On Writs of Certiorari to the United States  
Court of Appeals for the Second Circuit

---

**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of the American Center For Law And Justice in Support Of Petitioners complies with the pertinent word limitations. 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 4,723 words.

/s/ Jay Alan Sekulow  
Jay Alan Sekulow

February 4, 2025