

CERTIFICATE OF COMPLIANCE

No. 24-220, *Jacobsen v. Montana Democratic Party*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* Center for Election Confidence contains 5,119 words, excluding the parts of the brief 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 November 7, 2024

/s/ Stephen M. Duvernay
Stephen M. Duvernay
Counsel for *Amicus Curiae*