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Scott S. Harris Clerk Supreme Court of the United States 1 First Street, NE Washington, DC 20543

Re: Kennedy v. Braidwood Management, No. 24-316

Dear Mr. Harris:

I am the author of the American College of Gastroenterology's amicus brief in support of neither party. I certify that the brief contains 3,748 words and thus complies with S. Ct. R. 33(g).

Respectfully,

Andrew Tauber

Ardrow Tarlow