## SUPREME COURT OF THE UNITED STATES

No. 24-41 -----X MICHAEL D. COHEN,

Petitioner,

v.

DONALD J. TRUMP, FORMER PRESIDENT OF THE UNITED STATES, ET AL.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,963 words, excluding the parts of the document 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 this 30th day of September, 2024.

Natasha S. Johnson

Sworn to and subscribed before me this 30th day of September, 2024.

MARIANA BRAYLOVSKIY

Notary Public State of New York No. 01BR6004935 Qualified in Richmond County

Mariana Braylovsby

Commission Expires March 30, 2026

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