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January 12, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE No. 16-1435: MINNESOTA VOTERS ALLIANCE, ET AL. V. JOE MANSKY, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Institute for Free Speech in Support of Petitioners referenced above contains **3,675** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerelv

Arthur D. Chotin, Esq.

Arthur D. Chotin, Esq. Principal