In the Supreme Court of the United States

SHARONELL FULTON, ET AL.,

Petitioners,

v.

CITY OF PHILADELPHIA, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Charles A. Rothfeld, counsel for *Amicus Curiae* Lawrence G. Sager, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of *Amicus Curiae* Lawrence G. Sager Supporting Respondents consists of 5,268 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).

/s/ Charles A. Rothfeld

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