## In The Supreme Court Of The United States

PETER BRET CHIAFALO, LEVI JENNET GUERRA, AND ESTHER VIRGINIA JOHN,

Petitioners,

CERTIFICATE OF WORD COUNT

STATE OF WASHINGTON,

v.

Respondent.

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Response Brief, which was prepared using Century Schoolbook 12-point typeface, contains 12,986 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I am a member of the Bar of the Supreme Court of the United States.

DATED this 1st day of April 2020.

s/ Noah G. Purcell
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