

Certification of Word Count

No.

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In the  
**Supreme Court of the United States**

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MICHAEL LAMBERT, AN INDIVIDUAL, PETITIONER,

v.

ESTATE OF KEVIN BROWN, BY ITS SUCCESSOR IN INTEREST  
REBECCA BROWN; REBECCA BROWN, SUCCESSOR IN INTEREST TO  
THE ESTATE OF KEVIN BROWN

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**PETITION FOR WRIT OF CERTIORARI**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5748 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 10/21/2019

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