## No. 20-1008

## IN THE Supreme Court of the United States

STATE FARM LIFE INSURANCE COMPANY, *Petitioner*,

v.

 $\begin{array}{c} {\rm MICHAEL\,G.\,VOGT,} \\ {\it Respondent.} \end{array}$ 

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,192 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 February 26, 2021.

/s/ Adam G. Unikowsky
Adam G. Unikowsky