No. 20-1210 In the Supreme Court of the United States

SENECA COUNTY, NEW YORK,

Petitioner,

v.

CAYUGA INDIAN NATION OF NEW YORK, Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,982 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 May 3, 2021.

/s/ David W. DeBruin
David W. DeBruin