

IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
JANE CUMMINGS,

*Petitioner,*

v.

PREMIER REHAB KELLER, P.L.L.C.,

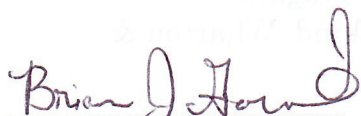
*Respondent.*

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**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**  
\_\_\_\_\_

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Law Professors as *Amici Curiae* in Support of Petitioner contains 7,663 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 August 30, 2021.



\_\_\_\_\_  
Brianne J. Gorod  
Counsel for *Amici Curiae*