

No. 21-1157
IN THE
Supreme Court of the United States

DENNIS SPENCER,
Petitioner,
v.
COLORADO,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,925 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 March 24, 2022.

/s/ Douglas E. Litvack
Douglas E. Litvack