No. 21-____

IN THE Supreme Court of the United States

ERIC LUND,

Petitioner,

v.

JEFFREY DATZMAN, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *Lund v. Datzman*, No. 21-___, complies with the word limitations, as it contains 8,786 words.

I declare under penalty of perjury that the foregoing is true and correct.

Jeffrey R. Johnson

Date: February 23, 2022