

In the Supreme Court of the United States

DON BARNES, SHERIFF AND ORANGE COUNTY, CALIFORNIA, PETITIONERS

v.

MELISSA AHLMAN, ET AL., RESPONDENTS

*ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE NINTH CIRCUIT*

**CERTIFICATE OF COMPLIANCE WITH RULE 33.1
RE: PETITION FOR A WRIT OF CERTIORARI**

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CERTIFICATE OF COMPLIANCE WITH RULE 33.1

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the accompanying document, **PETITION FOR A WRIT OF CERTIORARI**, submitted to this Court complies with the word limitations of Supreme Court Rule 33.1.

As required by Supreme Court Rule 33.1(h), I certify that the **PETITION FOR A WRIT OF CERTIORARI** contains 3,771 words, including footnotes, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d). In making this certification, I have relied on the word count of the computer program used to prepare the document, which includes footnotes.

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

Executed in Santa Ana, California this 11th day of April, 2022.

By: _____
D. Kevin Dunn