IN THE SUPREME COURT OF THE UNITED STATES

No. 21-147

ERIK EGBERT,

Petitioner,

v.

ROBERT BOULE,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Independent Women's Law Center's brief in this case contains 4,720 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

Counsel for Amicus Curiae

December 27, 2021