

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1535

DAVID LOWERY,
Petitioner,

v.

BENJAMIN JOFFE, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief in Opposition for Individual Respondents, which was prepared using Century Schoolbook 12-point typeface, contains 8,736 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2016) used to prepare the document.

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

Executed on August 22, 2022.



Robert W. Cobbs
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Individual Respondents*