

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Petition for Writ of Certiorari in Doe v. Sterling complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 6,035 words, based on the word-count function of Microsoft Word, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read 'A. Losey', with a stylized flourish at the end.

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