

IN THE  
SUPREME COURT OF THE UNITED STATES

No. 21-268

COVERALL NORTH AMERICA, INC.

*Petitioner,*

v.

CARLOS RIVAS

*Respondent.*

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Certificate of Compliance With  
Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation & Washington Legal Foundation as *Amici Curiae* in Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **5,044** words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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