

**CERTIFICATE OF WORD COUNT**

**No. TBD**

Bruce H. Zitka and Susan k. Hernandez-Zitka,  
*Petitioners,*  
v.

State of Michigan,  
*Respondent.*

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STATE OF MASSACHUSETTS )  
COUNTY OF NORFOLK ) SS.:

Being duly sworn, I depose and say:

1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.
2. That, as required by Supreme Court Rule 33.1(h), I certify that the BRUCE H. ZITKA AND SUSAN K. HERNANDEZ-ZITKA PETITION FOR WRIT OF CERTIORARI contains 5055 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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



Lucas DeDeus

August 30, 2021

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