## IN THE SUPREME COURT OF THE UNITED STATES

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No. 21-441

ALFRED H. SIEGEL, TRUSTEE OF THE CIRCUIT CITY STORES, INC. LIQUIDATING TRUST, PETITIONER

v.

JOHN P. FITZGERALD, III, ACTING UNITED STATES TRUSTEE FOR REGION 4

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Brief for the Petitioner in the above-captioned case contains 9,177 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel L. Geyser
Daniel L. Geyser

February 24, 2022