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June 2, 2022

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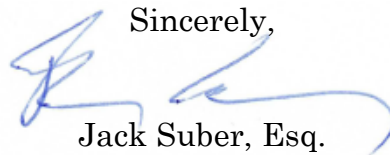
**RE NO. 21-476: 303 CREATIVE LLC, ET AL. V. AUBREY ELENIS, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Kent Greenfield referenced above contains **6,191** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 2nd day of June 2022.

