

CERTIFICATE OF COMPLIANCE

1. This brief complies with the type-volume limitation of SUPREME COURT RULES 33.1(g) and 33.2 because this brief contains 2,854 words and/or is less than 40 pages in length, excluding the parts of the brief exempted by Rule.
2. This brief complies with the type-volume limitation of SUPREME COURT RULES 14 and 34.

Date: July 19, 2021

/s/ Matt Zimmerman
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