

**CERTIFICATE OF WORD COUNT AND
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Petitioner in 21-588, including the words on the last page of the brief, “October 27, 2021” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 1500 words, since his word-processing program states the word count is 1500 words. Thank you for your time.

October 27, 2021

Respectfully submitted,

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