IN THE

Supreme Court of the United States

LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS,

Petitioner,

v.

GRETCHEN WHITMER, GOVERNOR OF THE STATE OF MICHIGAN, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that the Petition for a Writ of Certiorari contains 8,142 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), and complies with the word limitation established by Supreme Court Rule 33.1(g)(ii).

Dated: January 24, 2022

Michael E. Cayanaugh