In the Supreme Court of the United States

MIGUEL LUNA PEREZ,

Petitioner,

v.

STURGIS PUBLIC SCHOOLS, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Respondents in *Miguel Luna Perez v. Sturgis Public Schools, et al.*, S. Ct. No. 21-887, complies with the word limitations, because it contains 12,992 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: December 9, 2022

Shay Dvoretzky