IN THE SUPREME COURT OF THE UNITED STATES

No. 21-____

DANIEL BIERBACH, Petitioner,

v.

DIGGER'S POLARIS AND STATE AUTO/UNITED FIRE & CASUALTY GROUP, *Respondents.*

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Petition for a Writ of Certiorari to the Supreme Court of Minnesota, which was prepared using Century Schoolbook 12-point typeface, contains 3,352 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the wordprocessing system (Microsoft Office Word 2013) used to prepare the document.

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

Executed on January 11, 2022.

Tod C. Induik

David C. Frederick Counsel of Record for Petitioner