IN THE SUPREME COURT OF THE UNITED STATES

No. 21-998

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 Supplemental Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 2,980 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 word-processing system (Microsoft Office Word 2016) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 31, 2022.

David C. Frederick

Counsel of Record for Petitioner

Tod C. Forderick