

No. 21-998

IN THE  
**Supreme Court of the United States**

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DANIEL BIERBACH,

*Petitioner,*

v.

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

*Respondents.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Supplemental Brief for Respondents contains 1,417 words and complies with the word limitation established by Rule 33.1(g)(iv) of the Rules of this Court.

Dated: June 2, 2022

*/s/ Susan KH Conley*

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Susan KH Conley