

**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

FRANK J. LAWRENCE, JR.,

Petitioner,

v.

UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF MICHIGAN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 3,401 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on May 26, 2023

/s/ Dennis Dubuc  
Dennis Dubuc  
Counsel for Petitioner