IN THE SUPREME COURT OF THE UNITED STATES

No. 22-1218

WENDY SMITH, ET AL., PETITIONERS

v.

KEITH SPIZZIRRI, ET AL.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioners and a member of the Bar of this Court, certify that the Brief for the Petitioners in the above-captioned case contains 7,168 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

> <u>/s/ Daniel L. Geyser</u> Daniel L. Geyser

February 26, 2024