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 Reply Brief for the Petitioners in the above-captioned case contains 6,000 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

> /s/ Daniel L. Geyser Daniel L. Geyser

April 12, 2024