## No. 22-138

## BILLY RAYMOND COUNTERMAN, Petitioner,

v.

## COLORADO,

Respondent.

## CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF THE RUTHERFORD INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER, as indicated by the word count feature of MS Word and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 5,980 words.

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

Executed on this 12th day of September, 2022.

Anthony G Lantagne

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(804) 644-0477

OMMONWEALTH OF VIRGINIA	)	
CITY OF RICHMOND	)	to-wit:

Anthony G. Lantagne appeared before me this <u>12th</u> day of September, 2022, and attested that the foregoing certificate is true and exact to the best of his knowledge

and belief.

<del>Ke</del>jona Redd