IN THE

Supreme Court of the United States

 $\begin{array}{c} \text{Geraldine Tyler,} \\ \text{on behalf of herself and all others similarly situated,} \\ Petitioner, \end{array}$

v.

HENNEPIN COUNTY, and DANIEL P. ROGAN, Auditor-Treasurer, in his official capacity,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Professor Beth A. Colgan as *Amicus Curiae* in Support of Petitioner contains 8,000 words and complies with the word limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: March 6, 2023

/s/ Matthew S. Rozen

Matthew S. Rozen