

IN THE
Supreme Court of the United States

GERALDINE TYLER, on behalf of herself and all others similarly situated,
Petitioner,

v.

HENNEPIN COUNTY, and DANIEL P. ROGAN, AUDITOR-TREASURER, in his official
capacity,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Oakland County as *Amicus Curiae* in Support of Respondents contains 3,875 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), and complies with the word limitation established by Supreme Court Rule 33.1(g).

Dated: April 4, 2023

/s/ John J. Bursch

John J. Bursch