In the Supreme Court of the United States

GERALD E. GROFF, GERALD,

PETITIONER,

v.

Louis DeJoy,

CERTIFICATE OF WORD COUNT

RESPONDENT.

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Amicus Brief, which was prepared using Century Schoolbook 12-point typeface, contains 5,073 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I am a member of the Bar of the Supreme Court of the United States.

DATED this 30th day of March 2023.

s/ Karl David Smith

Karl David Smith
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