

In the Supreme Court of the United States

No. 22-177

MONICA TOTH, PETITIONER,

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel Gedge, a member of the Bar of this Court, certify that the Petition for Rehearing in the above-captioned case contains 990 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: February 17, 2023.

/s/ Samuel B. Gedge

SAMUEL B. GEDGE

Counsel of Record

INSTITUTE FOR JUSTICE

901 North Glebe Road, Suite 900

Arlington, VA 22203

(703) 682-9320

sgedge@ij.org