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June 1, 2023

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE 22-193: JATONYA CLAYBORN MULDROW V. CITY OF ST. LOUIS, MISSOURI, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Supplemental Brief for Respondent City of St. Louis referenced above contains **2,952** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,

Jack Suber, Esq.

Principal



Sworn and subscribed before me this 1st day of June 2023.