# IN THE SUPREME COURT OF THE UNITED STATES 

No. 22-227

## Lac du Flambeau Band of Lake Superior Chippewa Indians, et al., Petitioners, v.

Brian W. Coughlin, Respondent.

## CERTIFICATE OF WORD COUNT

Pursuant to Rule $33.1(\mathrm{~h})$ of the Rules of this Court, I certify that the accompanying Brief in Opposition, which was prepared using Century Schoolbook 12-point typeface, contains 5,448 words, excluding the parts of the document that are exempted by Rule $33.1(\mathrm{~d})$. This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2016) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 8, 2022.


Counsel of Record for Respondent

