In the Supreme Court of the United States

GREAT LAKES INSURANCE SE, PETITIONER, v. RAIDERS RETREAT REALTY CO., LLC, Respondent

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Dennis J. Nolan, a member of the Bar of this Court, certify on this 4th day of August, 2023, that the Brief For *Amicus Curiae* United Policyholders Supporting Respondents in the foregoing case contains 4,722 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dennis J. Nolan

ANDERSON KILL P.C.

1251 Avenue of the Americas

42nd Floor

New York, NY 10020

(212) 278-1000

dnolan@andersonkill.com

Sworn and subscribed to before

me this $\frac{1}{2}$ day of $\frac{\text{Qugust}}{2}$, 2023

Notary Public

