

**No. 22-7058**  
**IN THE**  
**SUPREME COURT OF THE UNITED STATES**

**MICHAEL S. HELMSTETTER, — PETITIONER**  
**v.**  
**DAVID HERZOG, ET AL.,--RESPONDENTS**

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,132 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on June 12, 2023

/s/ Michael T. Stanley