IN THE SUPREME COURT OF THE UNITED STATES

No. 22-720

DAKOTA FINANCE LLC, DBA ARABELLA FARM, ET AL., Petitioners,

v.

NATURALAND TRUST, ET AL., Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(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 6,200 words, excluding the parts of the document that are exempted by Rule 33.1(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 April 3, 2023.

(Asalia) Kel

Michael K. Kellogg Counsel of Record for Respondents