

In the
Supreme Court of the United States

Richard E. Gardiner,
Petitioner,

v.

Nels Anderson,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Petition for Writ of Certiorari filed by Petitioner Richard E. Gardiner contains 4083 words, excluding 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.

Executed on the 13th day of March, 2023.

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