

## CERTIFICATE OF WORD COUNT

Case No.

Case Name: Paremsky v. Ingham County Medical  
Care Facility

Title: Petition for a Writ of Certiorari

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the foregoing Petition for Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 8,995 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 Word) used to prepare the document.

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

DATED this 22nd day of March, 2023.

Respectfully submitted,

*/s/ Elena A. Paremsky*

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