

SUPREME COURT OF THE UNITED STATES

No. 22-968

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GINGER ATHERTON,

*Petitioner,*

*v.*

KEY BANK, N.A.,

*Respondent.*

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**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,910 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

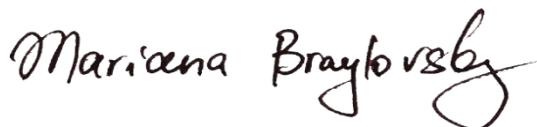
I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2023.



\_\_\_\_\_  
Noel Reyes

Sworn to and subscribed before me this 22<sup>nd</sup> day of May 2023.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026

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