

In the
Supreme Court of the United States

DENNIS O'CONNOR,

Petitioner,

v.

RACHAEL EUBANKS, in her personal capacity;
TERRY STANTON, in his personal capacity;
STATE OF MICHIGAN,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Renée D. Flaherty, counsel of record for amicus and a member of the Bar of this Court, certify that the Brief of the Institute for Justice as Amicus Curiae in Support of Petitioner in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the brief complies with the word limit of Supreme Court Rule 33.1(g). It contains 2,451 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

May 30, 2024

s/ Renée D. Flaherty

Renée D. Flaherty

Counsel of Record

INSTITUTE FOR JUSTICE

901 N. Glebe Rd., Ste. 900

Arlington, VA 22203

(703) 682-9320

rflaherty@ij.org