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June 13, 2024

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

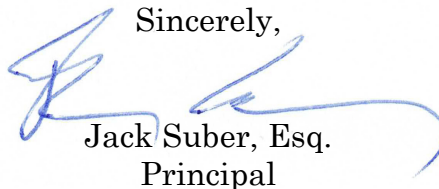
**RE NO. 23-1214: TANISHIA V. SERVICE EMPLOYEES INTERNATIONAL UNION  
LOCAL 2015, ET AL.**

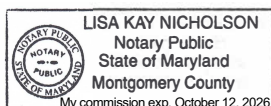
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Upper Midwest Law Center referenced above contains **3,878** 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.

Sincerely,

  
Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 13th day of June 2024.

