In The

Supreme Court of the United States

SPEECH FIRST, INC.,

Petitioner,

v.

TIMOTHY SANDS, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNIVERSITY OF VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY, Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amicus Curiae of Wisconsin Institute for Law & Liberty, Inc. in Support of Petitioner in case No. 23-156 contains 4,075 words, calculated using the word count function of Microsoft Word for Mac, excluding parts of the document that are exempted by Rule 33.1(d), and thus complies with the word limits set forth in Rule 33.1(g).

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

Executed on the 14 day of September, 2023.

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