No. 23-50

In The Supreme Court of the United States

JASCHA CHIAVERINI, ET AL.,

Petitioners,

v.

CITY OF NAPOLEON, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Marie Miller, a member of the Bar of this Court, certify that the Brief for the Institute for Justice as Amicus Curiae Supporting Petitioners in the above-captioned case contains 4,757 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

February 7, 2024

<u>/s/ Marie Miller</u> MARIE MILLER *Counsel of Record* INSTITUTE FOR JUSTICE 3200 N. Central Ave. Ste. 2160 Phoenix, AZ 85012 (480) 557-8300 mmiller@ij.org