

**Supreme Court of the United States**

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JOHN DOE,

*Petitioner,*

v.

ROLLINS COLLEGE,

*Respondent.*

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**CERTIFICATE OF WORD COUNT**

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As required by Supreme Court Rule 33.1(h), I certify that the supplemental brief in this case complies with the word limitations. The supplemental brief contains 616 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Bryan S. Gowdy  
Counsel of Record

February 21, 2024