

Supreme Court of the United States

JOHN DOE,

Petitioner,

v.

ROLLINS COLLEGE,

Respondent.

CERTIFICATE OF WORD COUNT

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
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