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December 21, 2023

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

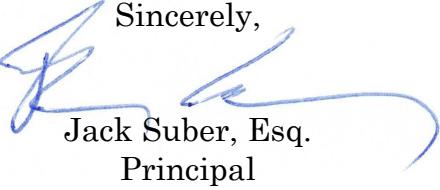
**RE 23-550: LAURA BARBOUR BOWES, AS EXECUTOR OF THE ESTATE OF EVA PALMER
v. LIBERTY UNIVERSITY, INC.**

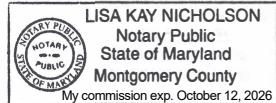
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition referenced above contains **5,425** 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 21st day of December 2023.

