

In The  
Supreme Court of the United States

————— ♦ —————  
JERRY S. WILSON,

Petitioner,

v.

MICHAEL G. GIERACH,

Respondent.

————— ♦ —————  
**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**  
————— ♦ —————

As required by Supreme Court Rule 33.1(h), I, Jacob J. Wittwer, certify that the Brief in Opposition in the foregoing case contains 6,467 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.

Executed on February 1, 2024.

/s/ Jacob J. Wittwer

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