SUPREME COURT OF THE UNITED STATES

No. 23-6163 -----X VIDALA AARONOFF,

Petitioner,

v.

CURTIS OLSON,

Respondent.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File contains 147 words, and the Brief for *Amici Curiae* contains 5,078 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 this 4th day of January, 2024.

Bryant Lee

Sworn to and subscribed before me on this 4th day of January, 2024.

Mariana Braylovsb

MARIANA BRAYLOVSKIY Notary Public State of New York No. 01BR6004935 Qualified in Richmond County Commission Expires March 30, 2026