In the

Supreme Court of the United States

DEBRA A. VITAGLIANO,

Petitioners,
v.
COUNTY OF WESTCHESTER,

Respondents.

CERTIFICATION OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,391 words, excluding those 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 August 23, 2023 in Ojai, California.

Catherine W. Short

Counsel of Record for Amici Curiae Life Legal Defense Foundation and Walter B. Hoye II