In the Supreme Court of the United States

DEBRA A. VITAGLIANO, PETITIONER

v

COUNTY OF WESTCHESTER, RESPONDENT

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

I certify that the amicus brief contains 2,801 words, excluding the parts exempted by Supreme Court Rule 33.1(d) I declare under penalty of perjury that this certification is true.

Executed on August 24, 2023.

/s/ Jonathan F. Mitchell JONATHAN F. MITCHELL Counsel for Amicus Curiae Mitchell Law PLLC 111 Congress Avenue, Suite 400 Austin, Texas 78701 (512) 686-3940 jonathan@mitchell.law