## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the foregoing Petition for a Writ of Certiorari complies with the word limit of Sup. Ct. R. 33.1 because, excluding the parts of the document exempted by Sup. Ct. R. 33.1(d), this document contains 8,960 words.

Executed on February 9, 2024.

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