

In the Supreme Court of the United States

ROBIN ROOT, PETITIONER

v.

JEREMY HOWARD, WARDEN

**ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

CERTIFICATE OF COMPLIANCE

Attorney for Respondent Jeremy Howard, Warden, hereby certifies that the foregoing Brief in Opposition complies with the type-volume limitation of Supreme Court Rule 33.1(g)(ii), in that the word-processing system used to prepare the brief indicates that the brief contains 7,603 words.

Respectfully submitted,

Ann M. Sherman

Ann M. Sherman
Solicitor General
Counsel of Record
P.O. Box 30212
Lansing, Michigan 48909
ShermanA@michigan.gov
(517) 335-7628

Jared Schultz
Assistant Attorney General
Criminal Appellate and Parole Appeals
Division
Michigan Department of Attorney
General

Attorneys for Respondent

Dated: July 28, 2025