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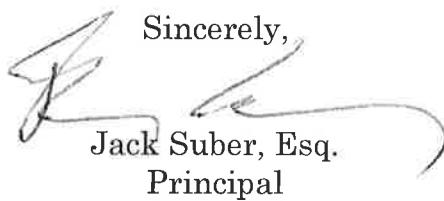
Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

RE: SPENCER F. SMITH v. THE STATE BAR OF CALIFORNIA

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Supplemental Brief in Support of Petition for Writ of Certiorari referenced above contains **2,705** 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.


Sincerely,
Jack Suber, Esq.
Principal

Sworn and subscribed before me this 23rd day of August 2024.

