

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-440

HAROLD R. BERK,
Petitioner,

v.

WILSON C. CHOY, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of the Honorables Mark W. Bennett and Royal Furgeson as *Amici Curiae* in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 4,253 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 3, 2025.



D. Chanslor Gallenstein
Counsel of Record for Amici