

CERTIFICATE OF WORD COUNT

Case No. 24-586

Case Names: Peyman Roshan, Applicant v. Melanie J. Lawrence, et al.

Title: SUPPLEMENTAL BRIEF DISCUSSING EFFECT OF *SEATTLE PACIFIC UNIVERSITY V. FERGUSON*

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Supplemental Brief in Support of Petition for a Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 2,749 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 Word) used to prepare the document.

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

DATED this 14th day of January 2025.

Respectfully submitted,



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