In the Supreme Court of the United States

OFFICER BENJAMIN M. BAUER.

Petitioner,

v.

ETHAN DANIEL MARKS,

Respondent.

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

BRIEF OF MINNESOTA POLICE AND PEACE OFFICERS ASSOCIATION AS AMICUS CURIAE IN SUPPORT OF PETITIONER

CERTIFICATE OF COMPLIANCE

As preparer of the document above, and in accordance with Supreme Court Rule 33.1(h), I hereby certify that the Brief of Minnesota Police and Peace Officers Association as *Amicus Curiae* in Support of Petitioner, is compliant with form and style, and contains <u>5,224</u> words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on January 9, 2025.

Stephen M. West Legal Brief Manager

Subscribed and sworn to before me this 9th day of January, 2025.

aw for

OMAR WAYNE YAMOOR

NOTARY PUBLIC MINNESOTA

MY COMMISSION EXPIRES 01/31/21

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