## SUPREME COURT OF THE UNITED STATES

No. 24-616

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OFFICER BENJAMIN M. BAUER,

Petitioner,

v.

ETHAN DANIEL MARKS,

Respondent,

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## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,976 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.

Executed on this 3<sup>rd</sup> day of January, 2025.

Ann Josel

Ann Tosel

Sworn to and subscribed before me on this 3<sup>rd</sup> day of January, 2025.

Mariana Braylovsby

MARIANA BRAYLOVSKIY Notary Public State of New York No. 01BR6004935 Qualified in Richmond County Commission Expires March 30, 2026