

### **CERTIFICATE OF COMPLIANCE**

I certify that according to the word-count tool in Microsoft Word, the petition for a writ of certiorari is 3,971 words, and a total of 15 pages, including footnotes and excluding the sections exempted by Rule 33.1(d). It thus complies with Rules 33.1(g) and 33.2(b).

Dated: April 3, 2025

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