

**CERTIFICATE OF WORD COUNT AND  
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Petitioners in 19-840, including the words on the first (and last) page, “April 30, 2020” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 8000 words, since his word-processing program states the word count is 8000 words. Thank you for your time.

April 30, 2020

Respectfully submitted,

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