

IN THE SUPREME COURT OF THE UNITED STATES

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No. 20-219

JANE CUMMINGS, PETITIONER

v.

PREMIER REHAB KELLER, P.L.L.C.

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for respondent and a member of the Bar of this Court, certify that the Brief for the Respondent in the above-captioned case contains 12,991 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

September 29, 2021