

July 15, 2020

Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20543

Re: Bridge Aina Le'a v. State of Hawaii

Dear Sirs,

Pursuant to Rule 33.1(d), this certifies that the word count in the Petition for Writ of Certiorari has been certified by the word count system on counsel's computer as containing 8,368 words (including footnotes).

Respectfully submitted,

s/ Michael M. Berger

Michael M. Berger
Counsel of Record for Petitioner

MMB:bah

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