

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 21-1052

UNITED STATES OF AMERICA, EX REL.
JESSE POLANSKY M.D., MPH.,

Petitioner,

v.

EXECUTIVE HEALTH RESOURCES, INC., ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Joshua J. Fougere, certify that the Brief of Washington Legal Foundation as *Amicus Curiae* in Support of Respondents in the foregoing case contains 4578 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 October 24, 2022.

/s/ Joshua J. Fougere
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