

No. 21-1360

In the Supreme Court of the United States

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MIKE KOWALL, ET AL, PETITIONERS

v.

JOCELYN BENSON, MICHIGAN SECRETARY OF STATE

**ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

CERTIFICATE OF COMPLIANCE

Attorney for Respondent Jocelyn Benson, Michigan Secretary of State, hereby certifies that the foregoing Brief in Opposition complies with the type-volume limitation of Supreme Court Rule 33.1(g)(ii), in that the word-processing system used to prepare the brief indicates that the brief contains 7,257 words.

Respectfully submitted,

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