

No. 21-147

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IN THE  
Supreme Court of the United States

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ERIK EGBERT,  
*Petitioner,*

v.

ROBERT BOULE,  
*Respondent.*

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On Writ of Certiorari to the United States Court of  
Appeals for the Ninth Circuit

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**CERTIFICATE OF COMPLIANCE WITH  
WORD-COUNT LIMITATIONS**

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I, Bruce D. Brown, counsel for amici curiae and a member of the Bar of this Court, certify that the Brief of the Reporters Committee for Freedom of the Press and 34 Media Organizations in Support of Respondent contains 5,098 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Date: January 26, 2022

/s/ Bruce D. Brown