

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

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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**

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I hereby certify that the accompanying Brief of Project for Privacy & Surveillance Accountability and Protect the First Foundation as *Amici Curiae* Supporting Respondent in *Egbert v. Boule*, No. 21-147, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 5,031 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).



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Gene C. Schaerr