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**In the Supreme Court of the United States**

UNITED STATES OF AMERICA,

*PETITIONER,*

v.

STATE OF WASHINGTON ET AL.,

*RESPONDENTS.*

CERTIFICATE OF  
WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief In Opposition, which was prepared using Century Schoolbook 12-point typeface, contains 8,541 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I am a member of the Bar of the Supreme Court of the United States.

DATED this 15th day of November 2021.

*s/ Noah G. Purcell*

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