
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 Response Brief, which was prepared using Century Schoolbook 12-point typeface, contains 12,999 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 25th day of March 2022.

s/ Noah G. Purcell

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