In the Supreme Court of the United States

Patricia Grossman,

Petitioner,

v.

Hawaii Government Employees Association et al.,

Respondents,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari for Petitioners in *Grossman v. Hawaii Government Employees Association, et al.* contains 5,320 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 21, 2021

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