

No. \_\_\_\_\_  
IN THE  
*Supreme Court of the United States*

LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS,  
*Petitioner,*

v.

GRETCHEN WHITMER, GOVERNOR OF THE STATE OF MICHIGAN, ET AL.,  
*Respondents.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,994 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 November 19, 2021.

/s/ Ian Heath Gershengorn  
Ian Heath Gershengorn