

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-998

DANIEL BIERBACH,
Petitioner,

v.

DIGGER'S POLARIS AND
STATE AUTO/UNITED FIRE & CASUALTY GROUP,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 742 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 Office Word 2016) used to prepare the document.

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

Executed on February 1, 2022.



David C. Frederick
Counsel of Record for Petitioner