

IN THE SUPREME COURT OF THE UNITED STATES

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No. 22-1218

WENDY SMITH, ET AL., PETITIONERS

v.

KEITH SPIZZIRRI, ET AL.

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Daniel L. Geyser, counsel for petitioners and a member of the Bar of this Court, certify that the Reply Brief for the Petitioners in the above-captioned case contains 3,000 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel L. Geyser  
Daniel L. Geyser

December 21, 2023