

In The
Supreme Court of the United States

GERALDINE TYLER,

Petitioner,

v.

HENNEPIN COUNTY, MINNESOTA, *et al.*,

Respondents.

**On Writ Of Certiorari To The United States
Court Of Appeals For The Eighth Circuit**

CERTIFICATE OF COMPLIANCE

In accordance with Supreme Court Rule 33.1(h), I certify that the foregoing Amicus Curiae Brief of PioneerLegal, LLC in Support of Petitioner contains 2,808 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.

Dated: March 6, 2023

/s/ Stephanie Schuster

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