

No. 22-174

GERALD E. GROFF,  
*Petitioner,*


v.

LOUIS DEJOY, POSTMASTER GENERAL,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

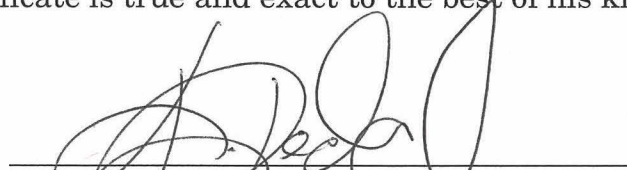
I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF THE RUTHERFORD INSTITUTE AS AMICUS CURIAE IN SUPPORT OF PETITIONER, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 2,453 words.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on this 26th day of September, 2022.

  
\_\_\_\_\_  
Anthony G. Lantagne  
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(804) 644-0477

COMMONWEALTH OF VIRGINIA    )  
CITY OF RICHMOND                )    to-wit:

Anthony G. Lantagne appeared before me this 26th day of September, 2022, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.

  
\_\_\_\_\_  
Keiona Redd

