

## CERTIFICATE OF WORD COUNT

Case No. 23-1084

Case Name: *Jill Hile, et al. v. State of Michigan, et, al.*

Document Title: Amicus Curiae Brief of Wisconsin Institute for Law & Liberty, Inc., and The Buckeye Institute in Support of the Petitioners

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Amicus Curiae Brief of Wisconsin Institute for Law & Liberty, Inc., and The Buckeye Institute in Support of the Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 5,788 words. This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

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

DATED this 8<sup>th</sup> day of May 2024.

Respectfully submitted,

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