

**CERTIFICATE OF WORD COUNT AND
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Neither Party in 23-719, including the words on the last page of the brief, “January 18, 2024” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 8000 words, since his word-processing program states the word count is 8000 words. Thank you for your time.

January 18, 2024

Respectfully submitted,

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