

In The
Supreme Court of the United States

CHELSEA KOETTER,

Petitioner,

v.

MANISTEE COUNTY TREASURER,

Respondent.

*On Petition For A Writ Of Certiorari
To The Michigan Court Of Appeals*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR REHEARING contains 920 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.

Executed on February 3, 2026.

s/ Christina M. Martin

CHRISTINA M. MARTIN

Counsel of Record

Pacific Legal Foundation

3100 Clarendon Blvd.

Suite 1000

Arlington, VA 22201

Telephone: (916) 330-4059

CMartin@pacificlegal.org

Counsel for Petitioner