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June 20, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: MARCUS TODD V. AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, COUNCIL 5

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari referenced above contains **6,007** 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.

Sincerely,

Jack Suber, Esq. Principal



Sworn and subscribed before me this 20th day of June 2025.