

IN THE
Supreme Court of the United States

THE GYM 24/7 FITNESS, LLC,

Petitioner,

v.

STATE OF MICHIGAN,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICI CURIAE OF CITIZEN ACTION DEFENSE FUND, BUILDING INDUSTRY ASSOCIATION OF WASHINGTON, AND WASHINGTON BUSINESS PROPERTIES ASSOCIATION IN SUPPORT OF PETITIONER in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains **3,440** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

March 28, 2025

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