CERTIFICATE OF WORD COUNT No. TBD

Christopher Schurr,

Petitioner,

v.

Peter Lyoya, as the Personal Representative for the Estate of Patrick Lyoya,

*Respondent.

I am counsel of record for Petitioner Christopher Schurr. As required by Supreme Court Rule 33.1(h), I certify that the CHRISTOPHER SCHURR PETITION FOR WRIT OF CERTIORARI contains 4179 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

Kali M. L. Henderson

Seward Henderson PLLC 210 East 3rd Street, Suite 212

Royal Oak, MI 48067

(248) 733-3580

khenderson@sewardhenderson.com

February 11, 2025