## IN THE SUPREME COURT OF THE UNITED STATES

No. 24-886

## CHRISTOPHER SCHURR,

Petitioner,

v.

PETER LYOYA, AS THE PERSONAL REPRESENTATIVE FOR THE ESTATE OF PATRICK LYOYA,

Respondent.

## **CERTIFICATE OF WORD COUNT**

I, Mark David Dodge, counsel for the Amici in the pending criminal matter, hereby certify that as required by Supreme Court Rule 33.1(h), I certify that the Brief of Criminal Defense Counsel for Petitioner as Amici Curiae in Support of Petitioner attached to Motion for Leave to File Late Brief of Amicus Criminal Defense Counsel for Petitioner as Amici Curiae in Support of Petitioner contains 2,092 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

Respectfully Submitted,

<u>/s/ Mark David Dodge</u> MARK DAVID DODGE *Counsel of Record* DODGE & DODGE, P.C. 200 Ottawa Ave., N.W. Suite 401 Grand Rapids, MI 49503 (616)459-3850 <u>dodgepc@dodgepc.com</u>