

No. 24-993

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**In The Supreme Court of the United States**

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GABRIEL OLIVIER,  
*v.*  
CITY OF BRANDON, ET AL.

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On Petition for a Writ of Certiorari to the United States  
Court of Appeals for the Fifth Circuit

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amici Curiae of the American Center for Law and Justice in Support of Petitioners complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 2,326 words.

/s/ Jay Alan Sekulow  
Jay Alan Sekulow

April 16, 2025