

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 24-993

GABRIEL OLIVIER,

*Petitioner,*

v.

CITY OF BRANDON, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Brief Of *Amicus Curiae* Human Rights Defense Center In Support Of Petitioner in the foregoing case contains 2,760 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.

Executed on April 17, 2025.

/s/ Tobias S. Loss-Eaton  
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