

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 24-993

GABRIEL OLIVIER,

Petitioner,

v.

CITY OF BRANDON, MISSISSIPPI, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Brief of *Amici Curiae* Human Rights Defense Center and American Association for Justice in Support of Petitioner in the foregoing case contains 4,454 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 September 9, 2025.

/s/ Tobias S. Loss-Eaton
TOBIAS S. LOSS-EATON
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8000
tlosseaton@sidley.com