In the Supreme Court of the United States

GABRIEL OLIVIER,

Petitioner,

v.

CITY OF BRANDON, ET AL., Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the above-captioned document contains 3,877 words, excluding the parts of the document that are exempt under Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

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