## 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 certify that the Brief for Amicus Curiae Texas Association of Counties in Support of Respondent contains 3,662 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

## State of Ohio County of Greene

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

Executed on October 21st, 2025.

Melvin L. Wright, Esq.

Moore & Wright Appellate Services

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: 10-21-2025

Notary Public

[seal]

DOUGLAS S. MOORE Notary Public, State of Ohio My Commission Expires December 18, 2027