

In the Supreme Court of the United States

CHRISTOPHER R. CUMMINS,
Petitioner,

v.

STATE OF ILLINOIS,
Respondent.

**On Petition for a Writ of Certiorari
to the Illinois Appellate Court**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 4,294 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 June 4, 2026.

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