

In the
Supreme Court of the United States

LEAH GILLIAM,

PETITIONER,

v.

DAVID GERREGANO,
COMMISSIONER OF THE TENNESSEE DEPARTMENT OF REVENUE,
AND JONATHAN SKRMETTI, TENNESSEE ATTORNEY GENERAL,

RESPONDENTS.

CERTIFICATE OF WORD COUNT

I, Daniel P. Lennington, counsel for Amicus Curiae Wisconsin Institute for Law & Liberty Inc. and the Buckeye Institute and a member of the Bar of this Court, certify that the brief of Amicus Curiae in support of Petitioner in the above-captioned case contains 2,915 words, excluding the parts that are exempted by Rule 33.1(d).

Dated: August 28, 2025.

/s/ Daniel P. Lennington

Daniel P. Lennington