

No. 25-1163
IN THE
Supreme Court of the United States

CARLOS PENA,
Petitioner,

v.

CITY OF LOS ANGELES, CALIFORNIA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,871 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 May 11, 2026.

/s/ Sarah M. Konsky
Sarah M. Konsky