

No. 25-1205

IN THE
Supreme Court of the United States

MICHAEL MENDENHALL,
Petitioner,

v.

CITY & COUNTY OF DENVER,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Timothy S. Durst, a member of the bar of this Court, hereby certify, on this 23rd day of April, 2026, that the Brief of Kenneth Walker and Anjanette Young as *Amici Curiae* in Support of Petitioner in the above-captioned case contains 5,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Timothy S. Durst
Timothy S. Durst