

No. 25-1205

IN THE
Supreme Court of the United States

MICHAEL MENDENHALL,

Petitioner,

v.

CITY & COUNTY OF DENVER,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Law Scholars as *Amici Curiae* in Support of Petitioner contains 4,414 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: May 11, 2026

/s/ Trenton Van Oss

Trenton Van Oss