

In The
Supreme Court of the United States

MICHAEL MENDENHALL,

Petitioner,

v.

CITY & COUNTY OF DENVER,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

As required by Supreme Court Rule 33.1(h), I, Anya Bidwell, counsel of record for petitioner Michael Mendenhall and a member of the Bar of this Court, certify that the Reply Brief in Support of Petition for a Writ of Certiorari in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Expanded Medium 12 point for the text and 10 point for the footnotes, and that the reply complies with the word limit of Supreme Court Rule 33.1(g). It contains 2,996 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

July 28, 2026

/s/ Anya Bidwell

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