

In the Supreme Court of the United States

No. 25-1210

DAVID PETERSEN, ET AL.,
PETITIONERS

v.

SNOHOMISH REGIONAL FIRE & RESCUE,
RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for Petitioners David Petersen, et al., and a member of the Bar of this Court, certify that the Supplemental Brief for Petitioner in the above-captioned case contains 589 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt

LISA S. BLATT

SEPTEMBER 29, 2026