

No. 25-1295

IN THE
Supreme Court of the United States

DONOVAN MOORE and JEFF KURTZ,
Officers, In Their Individual Capacities,

Petitioners,

v.

ASHLY ROMERO, Personal
Representative For the Estate
of Stephen Romero, Deceased, et al,

Respondents.

*On Petition for Certiorari from the United States
Court of Appeals for the Sixth Circuit*

**CERTIFICATE OF WORD COUNT FOR BRIEF
OF OAKLAND COUNTY AS *AMICUS CURIAE*
IN SUPPORT OF PETITIONERS**

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CERTIFICATE OF WORD COUNT

I, William H. Horton, certify that this document complies with Rule 33.1(h) of the Rules of this court, that the accompanying Brief of Oakland County as *Amicus Curiae* In Support of Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 1,867 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft 365) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 16, 2026

/s/ William H. Horton

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