

SUPREME COURT OF THE UNITED STATES

No. 25-179

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Officer Phillip Reinink,
in His Individual and Official Capacity,

Petitioner,

v.

Sean Hart, et al.,

Respondents.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,993 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on this 17th day of December 2025



Joseph Alvarez

Sworn to and subscribed before me this 17th day of December 2025



MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2026