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October 9, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 25-216: MATHEW GRASHORN V. WENDY LOVE, ET AL.

Dear Sir or Madam:

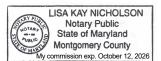
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Law Enforcement Legal Defense Fund referenced above contains **4,498** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,

Jack Suber, Esq.

Principal



Sworn and subscribed before me this 9th day of October 2025.