

IN THE
Supreme Court of the United States

CERTIFICATE OF COMPLIANCE

No. 25-22

RICKY KOEL,

Petitioner

v.

CITIZENS MEDICAL CENTER, INC., ET AL.,

Respondent(s)

As required by Supreme Court Rule 33.1(h), I certify that the brief in opposition to writ of certiorari contains 5,321 words, excluding the parts of the brief 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 August 6, 2025

/s/John T. Bird

Attorney for Citizens

Medical Center, Inc., et al.