

In the Supreme Court of the United States

UNITED STATES OF AMERICA AND STATE OF MICHIGAN EX REL. ERIK OLSEN, M.D.,
WILLIAM BERK, M.D., AND SAJITH MATTHEWS, M.D.,

Petitioners,

v.

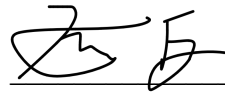
TENET HEALTHCARE CORPORATION; DETROIT MEDICAL CENTER,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

CERTIFICATE OF WORD COUNT

As required by this Court's Rule 33.1(h), I, Kathleen Foley, a member of the Bar of this Court, certify that the Brief of the American Academy of Emergency Medicine and the American College of Emergency Physicians as Amici Curiae in Support of the Petition contains 2,812 words, excluding the parts of the document that are exempted by Rule 33.1(d).



Kathleen Foley