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## In the Supreme Court of the United States

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JAMES GRIFFITHS,  
Petitioner,

v.

RITA KEITH,  
Respondent.

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### CERTIFICATE OF COMPLIANCE AND SERVICE

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Pursuant to S. Ct. R. 33.1(h), I certify that the brief in opposition contains 2,683 words, excluding parts exempted by S. Ct. R. 33.1(d).

Pursuant to S. Ct. R. 29.2, I certify that 40 copies in booklet format of the brief in opposition are sent to the Clerk of the Supreme Court of the United States through the United Parcel Service via Next Day Air postage prepaid, and was picked up by the United Parcel Service on this 21st day of January, 2026.

Lastly, I certify pursuant to S. Ct. R. 29.5(c), 3 copies of the brief in opposition are served all parties required to be served have been served via email and United States Postal Service via Priority Mail postage prepaid, this 21st day of January, 2026.

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

Executed on January 21, 2026.

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