

**CERTIFICATE OF WORD COUNT AND
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Respondents in 25-365, including the words on the last page of the brief, “February 18, 2026” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 8000 words, since his word-processing program states the word count is 8000 words. Thank you for your time.

February 18, 2026

Respectfully submitted,

David Boyle
Counsel of Record
P.O. Box 15143
Long Beach, CA 90815
dbo@boyleslaw.org
(734) 904-6132