

SUPREME COURT OF THE UNITED STATES

No. 25-378

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DONALD OLSEN,

Petitioner,

v.

AARON SALTER,

Respondent.
-----X

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h),
I certify that the document contains 2,999 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.

Executed on this 12th day of January, 2026.



Mariana Braylovskiy

Sworn to and subscribed before me this 12th day of January, 2026.



Robyn Cocho

Notary Public State of New Jersey

No. 2193491

Commission Expires January 8, 2027

#120867