

IN THE SUPREME COURT OF THE UNITED STATES

---

No. 25-4

PRESTON L. MARSHALL, IN HIS OFFICIAL CAPACITY AS CO-TRUSTEE OF  
PEROXISOME TRUST AND IN HIS PERSONAL CAPACITY,  
*Petitioner,*

v.

STEPHEN D. COOK, DOCTOR, IN HIS CAPACITIES AS CO-TRUSTEE OF  
THE MARSHALL HERITAGE FOUNDATION AND MARSHALL LEGACY FOUNDATION,  
*Respondent.*

---

**CERTIFICATE OF WORD COUNT**

---

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 2,997 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

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

Executed on August 13, 2025.

A handwritten signature in blue ink that reads "David C. Frederick". The signature is fluid and cursive, with the first name "David" and last name "Frederick" clearly legible.

David C. Frederick  
*Counsel of Record for Petitioner*