

CERTIFICATE OF WORD COUNT

Pursuant to this Court's Rule 33.1(h), I certify that the accompanying Brief was produced using Century Schoolbook 12-point typeface and together contain 1,860 words.

This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED this 11th day of August 2025.

Respectfully submitted,

/s/ Michael Ufferman

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