

**In the Supreme Court of the United States**

PUBLIC INTEREST LEGAL FOUNDATION, PETITIONER

v.

JOCELYN BENSON, IN HER OFFICIAL CAPACITY AS  
MICHIGAN SECRETARY OF STATE, ET AL.

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ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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Attorney for Respondent Jocelyn Benson, in her Official Capacity as Michigan Secretary of State, hereby certifies that the foregoing Brief in Opposition complies with the type-volume limitation of Supreme Court Rule 33.1(g)(ii), in that the word-processing system used to prepare the brief indicates that the brief contains 8,996 words.

Respectfully submitted,

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