

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.

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

CERTIFICATE OF COMPLIANCE

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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