

SUPREME COURT OF THE UNITED STATES

No. 25-451

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FAYTIMA HOWARD,

*Petitioner,*

*v.*

MACOMB COUNTY, MICHIGAN,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,948 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 15th day of December, 2025.

*Julie Connor*

\_\_\_\_\_  
Julie Connor

Sworn to and subscribed before me  
on this 15th day of December, 2025.

*Mariana Braylovsky*

**MARIANA BRAYLOVSKIY**

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026