In The Supreme Court of the United States

No.

PHILIP G. POTTER,

Petitioner,

v.

Incorporated Village of Ocean Beach, et al., Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Second Circuit

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari contains 6,823 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on October 10, 2025.

EUGENE A. SOKOLOFF

Counsel of Record

MOLOLAMKEN LLP
300 North LaSalle Street
Chicago, IL 60654
(312) 450-6718

esokoloff@mololamken.com

Counsel for Petitioner