

SUPREME COURT OF THE UNITED STATES

No. 25-464

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PHILIP G. POTTER,

*Petitioner,*

*v.*

INCORPORATED VILLAGE OF OCEAN BEACH, NEW YORK, *et al.*,

*Respondents,*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,164 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 6<sup>th</sup> day of January, 2026.



\_\_\_\_\_  
Ann Tosel

Sworn to and subscribed before me  
this 6<sup>th</sup> day of January, 2026.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026