

IN THE SUPREME COURT OF THE UNITED STATES

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No. 25-49

ALEXANDER SITTENFELD AKA P.G. SITTENFELD, PETITIONER

v.

UNITED STATES OF AMERICA

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, William T. Marks, counsel for amicus curiae Local 212, International Brotherhood of Electrical Workers, and a member of the Bar of this Court, certify that the Brief for Local 212, International Brotherhood of Electrical Workers, as Amicus Curiae Supporting Petitioner, contains 4,619 words, excluding the portions that are exempted by Rule 33.1(d).

William T. Marks

August 14, 2025