

No. 25-50

Supreme Court of the United States

MIKE FITZHUGH, ET AL.,
Petitioners,

v.

BRADLEY PATTON,
Respondent.

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

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF ALABAMA AND 20 OTHER STATES AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS contains 4,407 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on August 11, 2025.



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