

No. \_\_\_\_\_

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**IN THE SUPREME COURT OF THE UNITED STATES**

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KEITH FOSTER,  
*Petitioner,*

v.

COMMONWEALTH OF PENNSYLVANIA,  
*Respondent.*

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ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF  
PENNSYLVANIA

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**CERTIFICATE OF WORD COUNT**

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As required by the Rules of the Supreme Court of the United States Rule 33, I certify that the Petition for a Writ of Certiorari to the Supreme Court of Pennsylvania was prepared using Century Schoolbook 12-point typeface and contains 4,342 words, excluding the parts of the document that are exempted by Supreme Court Rule 33. This certificate was prepared in reliance on the word-count function of the word-processing system used to prepare the document.

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

Executed on July 29, 2025.

Respectfully Submitted:

*/s/ Steven A. Tehovnik*  
STEVEN A. TEHOVNIK  
Deputy – Trial  
*\*Counsel of Record*

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