

No. 25-_____

IN THE
Supreme Court of the United States

ANDREW GRIMM,

Petitioner,

v.

CITY OF PORTLAND,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Honorable Court and that, as required by Supreme Court Rule 33.1(h), the Petition for a Writ of Certiorari contains **8,999** words, excluding those portions of the Petition that are exempted by operation of Supreme Court Rule 33.1(d).

Date: Aug. 28, 2025

/s/ Gregory Keenan

Gregory Keenan