

**CERTIFICATE OF WORD COUNT AND
WORD LIMITATION COMPLIANCE**

The undersigned certifies, as per Supreme Court Rule 33.1(h), that the length of the accompanying Brief of *Amicus Curiae* David Boyle in Support of Respondent in 25-573, including the words on the last page of the brief, “January 8, 2026” and “Respectfully submitted”, but exclusive of “exempt” sections including the listing of counsel at the end, etc., is 6000 words, since his word-processing program states the word count is 6000 words. Thank you for your time.

January 8, 2026

Respectfully submitted,

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