

No. 25-672

In the Supreme Court of the United States

KATE ADAMS,

Petitioner,

v.

COUNTY OF SACRAMENTO; SCOTT JONES, SHERIFF.
Respondents.

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

**CERTIFICATE OF COMPLIANCE
WITH WORD LIMITATIONS**

As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Petitioner contains 5,225 words, excluding the parts of the brief that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ilya Shapiro

January 9, 2025

Ilya Shapiro
Counsel of Record