

IN THE SUPREME COURT OF THE UNITED STATES

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No. 25-672

KATE ADAMS,  
*Petitioner,*  
v.

SACRAMENTO COUNTY, CALIFORNIA, ET AL.,  
*Respondents.*

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**CERTIFICATE OF WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Law Enforcement Legal Defense Fund as *Amicus Curiae* in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 4,008 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

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

Executed on January 9, 2026.

  
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Alex P. Treiger  
*Counsel of Record for Amicus  
Law Enforcement Legal Defense Fund*