

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-672

KATE ADAMS,
Petitioner,
v.

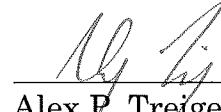
SACRAMENTO COUNTY, CALIFORNIA, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

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.



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