

CERTIFICATE OF COMPLIANCE

No. 25-798

RICK SIEGEL,

PETITIONER,

v.

JUDE SALAZAR,

RESPONDENT

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief of Professor Kevin Jerome Greene in support of Petitioner contains 1,837 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

January 29. 2026



Michael M. Berger