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January 6, 2026

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

**RE: KIM BOGARDUS V. CITY OF YAKIMA**

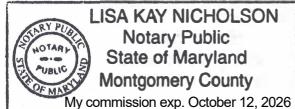
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari referenced above contains **2,132** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,

Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 6th day of January 2026.

*Lisa K. Nicholson*