

No. 25-965

In The
Supreme Court of the United States

DANIEL GRAND,

Petitioner,

v.

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Suranjan Sen counsel of record for amicus curiae and a member of the Bar of this Court, certify that the Brief for the Institute for Justice as Amicus Curiae in Support of Petitioner in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that it complies with the word limit of Supreme Court Rule 33.1(g). It contains 7,327 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

SEPTEMBER 8, 2026

/s/ Suranjan Sen

SURANJAN SEN
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
(703) 682-9320
ssen@ij.org