

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 33.1(h) of the Rules of the Supreme Court of the United States, I certify that this petition for a writ of certiorari contains 3314 **words**, excluding the parts of the petition that are exempted by Rule 33.1(d).

This petition has been prepared in a proportionally spaced typeface using **Century and Schoolbook, 12-point font** for the body text and **10-point font** for the footnotes, with 2-point leading between lines, as required by Rule 33.1(b).

The word count has been generated using earlier versions of **Microsoft Word for Office**.

December 19, 2025 Respectfully submitted,

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