

SUPREME COURT OF THE UNITED STATES

Case No. 26-172

-----X
Val French,

Petitioner,

v.

City Of Shawnee, Kansas, et al.,

Respondents.
-----X

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h),
I certify that the document contains 4,350 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.

Executed on September 8, 2026



Noel Reyes

Sworn to and subscribed before me this 8th day of September 2026.



MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2030

CP# 396348