
No. 26-180
In the
Supreme Court of the United States

EDWARD ALLYN HUDACKO,
Petitioner,
v.
REGENTS OF THE UNIVERSITY OF CALIFORNIA, *et al.*,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Amicus Curiae Sutherland Institute in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 1,969 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED this 9th day of September 2026.

Respectfully submitted,

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