

CERTIFICATE OF WORD COUNT

No. 26-193

Bethany M. Hall,

Petitioner,

v.

Scott Fleming,

Respondents.

I am counsel of record for Amicus Curiae Heritage Foundation. As required by Supreme Court Rule 33.1(h), I certify that the HERITAGE FOUNDATION AMICUS BRIEF contains 3076 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

/s/ Jonathan F. Mitchell

Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, TX 78701
(512) 686-3940
jonathan@mitchell.law

September 14, 2026