

IN THE SUPREME COURT OF THE UNITED STATES

No.

AMY L. GOLDMAN, PETITIONER

v.

TAMMY R. PHILLIPS; TAMMY R. PHILLIPS, APLC

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 5,518 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel L. Geyser
Daniel L. Geyser

September 4, 2026