No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

CRAIG MALIN, Petitioner,
v.
SARAH WATSON, DEB ANSELM, ASTRID GARCIA & LEE ENTERPRISES, INC.,
Respondents.

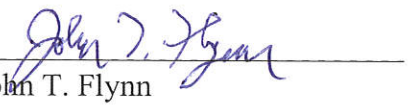
WORD COUNT CERTIFICATE

I, John T. Flynn, counsel of record for Petitioner Craig Malin, hereby certify pursuant to Supreme Court Rule 33.1(h) that the Petition for a Writ of Certiorari in the above-captioned case complies with the word limitation specified by Rule 33.1(g)(i).

According to the word-count system of the word-processing software used to prepare the petition, with footnotes included, the petition contains **8,982** words, excluding the portions exempted by Supreme Court Rule 33.1(d).

Dated: October 27, 2026

Respectfully submitted,



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