

**CERTIFICATE OF COMPLIANCE**

No. 21-614

Brian Green v. Pierce County, Washington

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Brief of *Amicus Curiae* Liberty Justice Center and Brief of *Amicus Curiae* in Support of Petitioner contains 3,477 words, excluding the parts of the brief 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 November 21, 2021

/s/ Daniel Suhr

Daniel R. Suhr

Counsel for *Amicus Curiae*