

No. 21-614

BRIAN GREEN,
Petitioner,

v.

PIERCE COUNTY, WASHINGTON,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute and Reason Foundation as *Amici Curiae* Supporting Petitioner contains 3,839 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record