In the Supreme Court of the United States

BILLY RAYMOND COUNTERMAN Petitioners

v.

THE PEOPLE OF THE STATE OF COLORADO, Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that, according to the word-count tool in Microsoft word, the Brief of First Amendment Scholars as Amici Curiae in Support of Respondent contains 7,736 words, excluding the parts of the document 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 March 31, 2023.

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