

**CERTIFICATE OF COMPLIANCE**

Case No. 22-539

Caption: Juliet Anilao, et al. v. Thomas J. Spota,  
et al.,

I hereby certify that the foregoing Brief of Respondents Thomas J. Spota, III, and Office of District Attorney in Opposition to Petition for a Writ of Certiorari contains a word count of 5,991 words in compliance with United States Supreme Court Rule 33(g)(ii).

/s/ Stephen L. O'Brien  
Stephen L. O'Brien