IN THE SUPREME COURT OF THE UNITED STATES

No. 23-1127

WISCONSIN BELL, INC.,

Petitioner,

v.

UNITED STATES EX REL. TODD HEATH,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 5,632 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).

nn W. Massion

August 15, 2024