In the Supreme Court of the United States

VERNON FIEHLER, PETITIONER

v.

CATHERINE W. MECKLENBURG, ET AL.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief in Opposition in *Vernon Fiehler v. Catherine W. Mecklenburg, et al.*, S. Ct. No. 23-1360, complies with the word limitations, because it contains 8,972 words, excluding the parts of the document exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 20, 2024

Shay Dvoretzky