

No. 23-\_\_\_\_

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IN THE  
*Supreme Court of the United States*

LEWIS COUNTY, KENTUCKY, ET AL.,

*Petitioners,*

v.

JULIE HELPHENSTINE,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

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Pursuant to Supreme Court Rule 33(h), I hereby certify that the Petition for a Writ of Certiorari contains 7266 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed September 14, 2023.

/s/ R. Trent McCotter  
R. Trent McCotter  
*Counsel of Record*