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No. 23-324

OFFICER GERALD L. FERREYRA, IN HIS INDIVIDUAL CAPACITY; OFFICER BRIAN A. PHILLIPS, IN HIS INDIVIDUAL CAPACITY, Petitioners,

> v. NATHANIEL HICKS, Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE NATIONAL FRATERNAL ORDER OF POLICE AND FRATERNAL ORDER OF POLICE UNITED STATES PARK POLICE LABOR COMMITTEE AS AMICUS CURIAE SUPPORTING PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4692 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 19th day of October, 2023. I am duly authorized under the laws of the State of Nebraska to administer oaths.

State of Nebraska – General Notary ANDREW COCKLE My Commission Expires April 9, 2026

Ondraw H. Colle

Kenee J. Yoss