In the Supreme Court of the United States

BETHESDA UNIVERSITY, ET AL.,

Petitioner,

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SEUNGJE CHO, ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the Court of Appeal of the State of California, Fourth Appellate District, Division Three

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Petitioners contains 2,357 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5, 2024.

/s/ Ilya Shapiro
Ilya Shapiro
Counsel of Record