

CERTIFICATE OF COMPLIANCE

Nos. 24-757, 24-754

THE GYM 24/7 FITNESS, LLC,
Petitioner,

v.

STATE OF MICHIGAN,
Respondent.

MOUNT CLEMENS RECREATIONAL BOWL, INC., ET AL.,
Petitioners,

v.

ELIZABETH HERTEL, ETC., ET AL.,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the brief of amici curiae in support of petition for a writ of certiorari contains 5,947 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

Feb. 14, 2025



Michael M. Berger