No. _____

In the Supreme Court of the United States

THE GYM 24/7 FITNESS, LLC, Petitioner,

v.

STATE OF MICHIGAN,

Respondent.

On Petition for Writ of Certiorari to the Michigan State Court of Appeals

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR WRIT OF CERTIORARI contains 8,779 words, excluding the parts of the document 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 January 14, 2025.

JONATHAN M. HOUGHTON *COUNSEL OF RECORD* PACIFIC LEGAL FOUNDATION 3100 CLARENDON BOULEVARD, SUITE 1000 ARLINGTON VA 22201 (202) 888-6881 JHOUGHTON@PACIFICLEGAL.ORG

Counsel for Petitioner