## No. 16-1495

## IN THE SUPREME COURT OF THE UNITED STATES

CITY OF HAYS, KANSAS, PETITIONER, *Petitioner*,

v.

## CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

I, Toby J. Heytens, a member of the Bar of this Court and co-counsel for petitioner, certify that this brief for petitioner complies with the word limitations of Rules 33(d) & (g) of this Court. In particular, according to the word count feature of Microsoft Word, the word processing program used to prepare the document, the sections of the petition not excluded under Rule 33(d) contain **8,998** words, including footnotes.

Toby J. Heytens

Dated: November 13, 2017