## No. 17-1712

## In the Supreme Court of the United States

JAMES J. THOLE and SHERRY SMITH, *Petitioners*,

υ.

U.S. BANK, N.A., ET AL., *Respondents*.

On Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF FOR LAW PROFESSORS AS AMICI CURIAE IN SUPPORT OF THE PETITIONERS contains 3,498 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 September 17, 2019.

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