No. 17-742 In The

Supreme Court of the United States

Mary Anne Sause, *Petitioner*,

v.

Timothy J. Bauer, et al., Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

I, David R. Cooper, a member of the Bar of this Court and co-counsel for respondents, certify that this brief in opposition for respondents 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 5,290 words, including footnotes.

David R. Cooper

Dated: January 19, 2018