No. 17	
In The Supreme Court of the United States	
Maricopa County, et al.	Petitioners
V.	
Manuela Villa,	Respondent

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for Writ of Certiorari in *Maricopa County v. Villa*, No. 17-____, complies with the word limitations, as it contains 6,083 words.

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

Date: December 13, 2017

Michael A Carvin