

**U.S. SUPREME COURT
CERTIFICATE OF COMPLIANCE**

ALVIN S. KANOFSKY
Petitioner
UNITED STATES OF AMERICA

V.

BETHLEHEM SCHOOL DISTRICT
Respondent

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari is 669 words, excluding the parts of the petition 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 February 11, 2019


Dr. Alvin S. Kanofsky