CERTIFICATE OF COMPLIANCE

No	
Missouri,	
	Petitioner

v.

Phillip Douglass & Jennifer M. Gaulter,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 7,458 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 August 29, 2018.

D. John Sauer Counsel of Record for Petitioner