

IN THE  
**Supreme Court of the United States**

MISSOURI,  
*Petitioner,*

v.

**PHILLIP DOUGLASS & JENNIFER M. GAULTER,**  
*Respondents.*

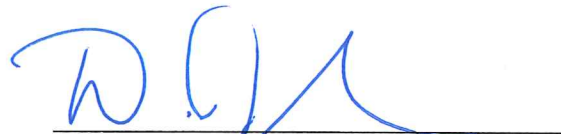
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.11(h), I hereby certify that the Reply Brief In Support of Petition for Writ of Certiorari contains 2,899 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 22, 2019.

  
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D. John Sauer  
SOLICITOR GENERAL  
STATE OF MISSOURI