

No. 18-485

In the Supreme Court of the United States

EDWARD G. McDONOUGH, PETITIONER

v.

YOUJEL SMITH, INDIVIDUALLY AND AS SPECIAL DISTRICT ATTORNEY FOR THE COUNTY OF
RENSSELAER, NEW YORK, AKA TREY SMITH, RESPONDENT

ON WRIT OF CERTIORARI TO

THE UNITED STATES COURT OF APPEALS

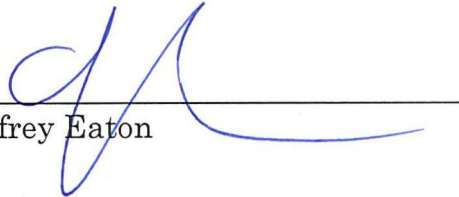
FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the International Municipal Lawyers Association, National League of Cities, and U.S. Conference of Mayors, as *Amici Curiae* in Support of Respondent in the above-captioned case contains 3,417 words, excluding the parts 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 April 3, 2019.



Geoffrey Eaton