No. 19-_

IN THE Supreme Court of the United States

FRESNO COUNTY SUPERINTENDENT OF SCHOOLS,

Petitioner,

v.

AILEEN RIZO,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in Fresno County Superintendent of Schools v. Rizo, No. 19-____, complies with the word limitations, as it contains 8,427 words.

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

Date: March 24, 2020

Shay Troutyly 145 Shay Dvoretzky