

No. 19-1176

---

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 Reply Brief for Petitioner in *Fresno County Superintendent of Schools v. Rizo*, No. 19-1176, complies with the word limitations, as it contains 2,983 words.

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

Date: June 2, 2020

  
Jeffrey R. Johnson