

No.19-1272

IN THE SUPREME COURT OF THE UNITED STATES

THOMAS CHRISTOPHER RETZLAFF

Petitioner,

v.

JASON LEE VAN DYKE

**CERTIFICATE OF COMPLIANCE
WITH WORD LIMITATIONS**

I, Daniel R. Ortiz, a member of the Bar of this Court and counsel for Petitioner, certify that this reply brief for petitioner complies with the word limitations of Rules 33(d) & (g) of this Court. In particular, according to the word count feature of Microsoft Word, the word processing program used to prepare the document, the sections of the brief not excluded under Rule 33(d) contain 2,996 words, including footnotes.



Daniel R. Ortiz

Dated: August 4, 2020