

IN THE SUPREME COURT OF THE UNITED STATES

CHARLES HAMNER,

Petitioner,

v.

DANNY BURLS, *ET AL.*

Respondents.

*On Writ of Certiorari to the United States
Court of Appeals for the Eighth Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ruth Brown, hereby certify I am a member of the bar of this Court, and that according to the word-count tool in Microsoft Word, the Brief of Professors of Civil Procedure and Federal Courts as *Amici Curiae* in Support of Petitioner consists of 3,181 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The brief therefore complies with Rule 33.1(g).

Dated: June 8, 2020

/s/ Ruth Brown
Ruth Brown
Counsel of Record
for Amici Curiae