## IN THE Supreme Court of the United States

CHARLES HAMNER,

Petitioner,

v.

DANNY BURLS, et al.

Respondent.

On Petition for a 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, Daniel M. Greenfield, hereby certify that I am a member of the bar of this Court, and that the document contains 2,966 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: September 16, 2020

/s/ Daniel M. Greenfield

Daniel M. Greenfield

Counsel of Record for

Petitioner Charles Hamner