

No. 19-1301

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IN THE  
**Supreme Court of the United States**

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CLYDE S. BOVAT,  
*Petitioner,*  
*v.*

STATE OF VERMONT,  
*Respondent.*

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
SUPREME COURT OF VERMONT

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I Alex Hemmer, a member of the bar of this Court, certify that the accompanying Brief for Amici Curiae The Rutherford Institute and Restore The Fourth, Inc., in Support of Petitioner contains 4,914 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on June 19, 2020.



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