IN THE SUPREME COURT OF THE UNITED STATES

Terry Olson,

Petitioner,

v.

Janis Amatuzio, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

I certify that Respondents Paul Schnell, Tom Roy, and Joan Fabian's Brief in Opposition to Petition for Writ of Certiorari contains 4,087 words, including footnotes and excluding the parts exempted by Supreme Court Rule 33.1(d), and is otherwise formatted in compliance with Rule 33.2 in accordance with the Court's April 15, 2020 order waiving certain formatting requirements in response to COVID-19 public health concerns.

Dated: July 15, 2020

s/ Angela Behrens

ANGELA BEHRENS Assistant Attorney General Counsel of Record

445 Minnesota Street, Suite 1400 St. Paul, MN 55101-2131 (651) 757-1204 (Voice) angela.behrens@ag.state.mn.us

ATTORNEY FOR RESPONDENTS SCHNELL, ROY, AND FABIAN