No. 19-1388

In the Supreme Court of the United States

JASON SMALL,

Petitioner,

v.

MEMPHIS LIGHT, GAS & WATER,

Respondent.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit

CERTIFICATE OF COMPLIANCE

• _____

As required by Supreme Court Rule 33.1(h), I certify that the Amici Curiae Brief contains 5,859 words, excluding the parts of the Amici Curiae Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2020.

JEREMY B. ROSE