In the Supreme Court of the United States

Steven T. Waltner and Sarah V. Waltner,

Petitioners,

v.

Commissioner of Internal Revenue,

Respondent.

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

CERTIFICATE OF COMPLIANCE

DONALD W. WALLIS

Counsel of Record

UPCHURCH, BAILEY & UPCHURCH, P.A.

780 N. Ponce de Leon Blvd.

Post Office Drawer 3007

St. Augustine, FL 32085

(904) 829-9066

dwallis@ubulaw.com

Counsel for Petitioners Steven T. Waltner and Sarah V. Waltner

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify as follows:

- 1. The Petition for Rehearing of Petition for a Writ of Certiorari of Steven T. Waltner and Sarah V. Waltner complies with the type and volume limitations set forth in the Rules of the United States Supreme Court. The Petition for Rehearing contains 1,896 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).
- 2. The Petition for Rehearing complies with the typeface requirements of Supreme Court Rule 33.1(b). It has been prepared with New Century Schoolbook font in 12-point type, with 10-point type in the footnotes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of November, 2019.

Sarah Van Hoey