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No. 19-285

JERUD BUTLER,  
Petitioner,

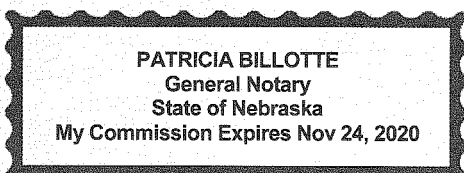
v.

BOARD OF COUNTY COMMISSIONERS  
FOR SAN MIGUEL COUNTY, ET AL.,  
Respondents.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE NATIONAL WHISTLEBLOWER CENTER AS AMICUS CURIAE IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 3100 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 1st day of October, 2019.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Patricia C. Billotte*  
Notary Public

*Andrew H. Cockle*  
Affiant