

No. _____
IN THE
Supreme Court of the United States

JONATHAN S. METCALF,
Petitioner,

v.

MICHAEL FITZGERALD, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,577 words, excluding the parts of the document 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 October 15, 2019.



Adam G. Unikowsky