

No. 19-490

IN THE
Supreme Court of the United States

JONATHAN S. METCALF,

Petitioner,

v.

MICHAEL FITZGERALD, ET AL.,

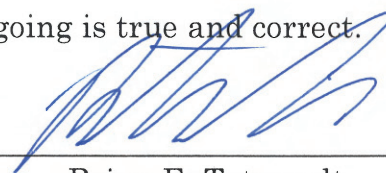
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief in Opposition in *Metcalf v. Fitzgerald*, No. 19-490, complies with the word limitations, as it contains 4,447 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 16, 2019



Brian E. Tetreault