No. 19-490 In The Supreme Court of the United States

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 2,264 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 December 18, 2019.

Adam G. Unikowsky