

No. 19-670

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IN THE  
**Supreme Court of the United States**

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ARNOLD FLECK,  
*Petitioner,*

v.

JOE WETCH, ET AL.,  
*Respondents.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Supreme Court Rule 33.1(h), the Brief in Opposition for Joe Wetch, Aubrey Fiebelkorn-Zuger, and Tony Weiler complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 7,815 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)



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Sarah E. Harrington  
February 3, 2020