In The Supreme Court of the United States

MELANIE KELSAY,

Petitioner,

v.

MATT ERNST,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, David M. Shapiro, hereby certify that I am a member of the bar of this Court, and that the document contains 448 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: June 12, 2020 <u>s/ David M. Shapiro</u>

David M. Shapiro
Counsel of Record for
Petitioner Melanie Kelsay