

In The
Supreme Court of the United States

Jeffrey Leiser,

Petitioner,

v.

Karen Kloth, et al.,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jody J. Schmelzer, certify that the Brief in Opposition in the foregoing case is 21 pages in length and contains 3,836 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 March 25, 2020.



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