No. 19-847

IN THE Supreme Court of the United States

JONATHAN REISMAN,

PETITIONER,

V.

ASSOCIATED FACULTIES OF THE UNIVERSITY OF MAINE, ET AL.,

RESPONDENTS.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Liberty Justice Center supporting petitioner's application for certiorari contains 3,266 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 February 5, 2020.

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