No. 19-847

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 Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioner contains 5,352 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro Counsel of Record