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.

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

CERTIFICATE OF WORDCOUNT

Pursuant to Supreme Court Rule 33.1(h), I certify that the Supplemental Brief for Petitioner filed in this matter contains 1,402 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: September 2020

Tulu

Andrew M. Grossman BAKER & HOSTETLER LLP 1050 Connecticut Ave., N.W. Washington, D.C. 20036 (202) 861-1697 agrossman@bakerlaw.com