No. 19-899 IN THE Supreme Court of the United States

SHANIZ WEST,

Petitioner,

v.

Doug Winfield, et al.,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,676 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 20, 2020.

Jessica Ring Amunson