## IN THE SUPREME COURT OF THE UNITED STATES

\_\_\_\_\_

No. 20-1143

DENISE A. BADGEROW, PETITIONER

v.

GREG WALTERS, ET AL.

\_\_\_\_\_

## CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

\_\_\_\_\_

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,999 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Daniel L. Geyser

April 16, 2021