

No. 20-1349

RACHEL THREATT,

Petitioner,

v.

JOANNE FARRELL, ON BEHALF OF HERSELF AND
ALL OTHERS SIMILARLY SITUATED, 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* in Support of Petitioner contains 4,350 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record