

No. 20-1471

**In the Supreme Court of the United States**

JONATHAN LOZADA, PETITIONER

*v.*

DUDLEY TEEL

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,087 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 August 23, 2021.

/s Andrew Tutt  
Andrew T. Tutt  
*Counsel of Record*  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 942-5000  
andrew.tutt@arnoldporter.com

August 23, 2021