

20-1752

DEVAR HURD,
Petitioner,
v.

STACEY FREDENBURGH,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioner contains 4,833 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jay R. Schweikert
Counsel of Record