

No. 20-_____

IN THE SUPREME COURT OF THE UNITED STATES

KIM R. HELPER,
Cross-Petitioner,

v.

PATRICK H. STOCKDALE, et al.,
Cross-Respondents.

On Cross-Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

CERTIFICATE OF COMPLIANCE

I, Joseph F. Whalen, counsel of record for Cross-Petitioner, Kim Helper, and a member of the Bar of this Court, hereby certify that the Conditional Cross-Petition for a Writ of Certiorari was formatted under the standards set forth in Supreme Court Rule 33.2, as allowed by this Court's order of April 15, 2020, and complies with that Rule because it is fewer than 40 pages. The brief also complies with the word limits of Supreme Court Rule 33.1 because it contains 2,645 words, excluding the parts of the cross-petition enumerated in Rule 33.1(d).

/s/ Joseph F. Whalen

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