IN THE

Supreme Court of the United States

ERNEST JOHNSON,

Petitioner,

v.

ANNE PRECYTHE ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief in opposition contains 4,408 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the forgoing is true and correct.

Executed on November 4th, 2020.

/s/ D. John Sauer

D. JOHN SAUER

Missouri Solicitor General