In the Supreme Court of the United States

POLK COUNTY, WISCONSIN

Petitioner,

v.

J.K.J. and M.J.J.,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Seventh Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Supporting Petitioner contains 5,372 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 November 2, 2020.

Michael J. Bentley

Counsel of Record

Bradley Arant Boult Cummings LLP

One Jackson Place

188 E. Capitol St., Ste. 1000

Jackson, MS 39201

(601) 948-8000

mbentley@bradley.com

Counsel for The National Sheriffs' Association, Amicus Curiae