

IN THE  
SUPREME COURT of the UNITED STATES

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MIKHAIL S. TSUKERMAN,

Petitioner,

v.

WESTERN COMMUNITY UNIT SCHOOL  
DISTRICT NO. 12

Respondent.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Respondent's Brief in Opposition contains 1089 words, excluding the parts of the Objection 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 14, 2020

s/Thomas J. Hunter

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