

No. 20-5166  
IN THE  
*Supreme Court of the United States*

J.J.H.,  
*Petitioner,*  
v.  
WAUKESHA COUNTY, WISCONSIN  
*Respondent.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the motion contains 391 words, and the brief contains 5,878 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 August 19, 2020.

/s/ Gabriel K. Gillett

Gabriel K. Gillett