No. 21-\_\_\_\_

IN THE Supreme Court of the United States

> ESTATE OF MADISON JODY JENSEN, EX REL. JARED JENSEN,

> > Petitioner,

v.

KENNON TUBBS,

Respondent.

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition

for a Writ of Certiorari in *Estate of Jensen v. Tubbs*, No. 21-\_\_\_, complies with the word limitations, as it contains 8,679 words.

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

Date: July 30, 2021

Louis K. Fisher