

No. \_\_\_\_

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IN THE SUPREME COURT OF THE UNITED STATES

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RAY J. FOSTER,

*Petitioner,*

v.

DEBORAH LYNN FOSTER,

*Respondent.*

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ON PETITION FOR WRIT OF CERTIORARI  
TO THE MICHIGAN SUPREME COURT

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CERTIFICATE OF WORD COUNT

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## **CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), and Orders of this Court dated April 15, 2020, I declare that the Petition for Writ of Certiorari to the Texas Supreme Court being filed herewith is 8,184 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Respectfully submitted,

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