

No. _____

In the
Supreme Court of the United States

BRIAN SKATTUM, *Petitioner*,

v.

DEVAN SKATTUM, *Respondent*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **Petition for a Writ of Certiorari** contains 3,437 words, including footnotes, but excluding the parts exempted by Supreme Court Rule 33.1(d).

Executed on March 15, 2023.



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