No. 22	
In The	
Supreme Court of the United States	
MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,	
	Petitioners
V.	
CHRISTOPHER GARNIER AND KIMBERLY GARNIER,	
	Respondents
CERTIFICATE OF COMPLIANCE	

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *O'Connor-Ratcliff v. Garnier*, No. 22-____, complies with the word limitations, as it contains 8,504 words.

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

Date: October 4, 2022

Hashim M. Mooppan