

No. 18-272

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IN THE  
**Supreme Court of the United States**

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FRESNO COUNTY SUPERINTENDENT OF SCHOOLS,

*Petitioner,*

v.

AILEEN RIZO,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Fresno County Superintendent of Schools v. Rizo*, No. 18-272, complies with the word limitations, as it contains 2,986 words.

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

Date: November 19, 2018

  
Shay Dvoretzky