

No. 18-525

Supreme Court of the United States

FORT BEND COUNTY,

Petitioner

v.

LOIS M. DAVIS,

Respondent

ON WRIT OF CERTIORARI TO THE U.S. COURT OF APPEALS FOR THE FIFTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Professor Scott Dodson as *Amicus Curiae* in Support of Neither Party contains 1,837 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

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

Executed on February 27, 2019.



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