

No. 18-525

IN THE
Supreme Court of the United States

FORT BEND COUNTY,

Petitioner,

v.

LOIS M. DAVIS,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent contains 6,276 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on April 3, 2019.



Ashwin P. Phatak
Counsel for *Amicus Curiae*