

No. 19-899

In the Supreme Court of the United States

SHANIZ WEST,

Petitioner,

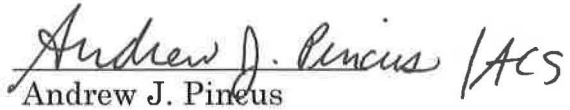
v.

DOUG WINFIELD, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for *amici curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of Legal Scholars as *Amici Curiae* in Support of Petitioner contains 5,768 words, excluding the parts of the brief that are exempted by Rule 33.1(d).


Andrew J. Pincus