

No. 20-1214

IN THE
Supreme Court of the United States

FRED J. EYCHANER,

Petitioner,

v.

CITY OF CHICAGO,

Respondent.

**On Petition for a Writ of Certiorari
to the Appellate Court of Illinois**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, hereby certify on this 14th day of April 2021, that the Brief of Law Professors as *Amici Curiae* in Support of Petitioner in the above-captioned case contains 4,914 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow

Meaghan VerGow