

SUPREME COURT OF THE UNITED STATES  
No. 20-1648

-----X  
James H. Fischer

*Petitioner,*

v.

Sandra F. Forest, et al.,

*Respondents.*

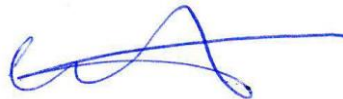
-----X

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,175 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 October 1st, 2021



\_\_\_\_\_  
Candice Best

Sworn to and subscribed before me  
this 1<sup>st</sup> day of October, 2021



\_\_\_\_\_  
**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2022

#306478