

No. 20-951

In the Supreme Court of the United States

MARY STEWART, AS ADMINISTRATOR OF THE ESTATE
OF LUKE O. STEWART, SR.,

Petitioner,

v.

CITY OF EUCLID, OHIO, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for *Amici Curiae* Legal Scholars, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of Legal Scholars as *Amici Curiae* In Support of Petitioner consists of 5433 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Petition therefore complies with Rule 33.1(g).

/s/ Andrew J. Pincus

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