

No. 22-324

IN THE
Supreme Court of the United States

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

Petitioners,

v.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Supplemental Brief for Petitioners in *O'Connor-Ratcliff v. Garnier*, No. 22-324, complies with the word limitations, as it contains 2,695 words.

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

Date: March 14, 2023


Jeffrey R. Johnson