## IN THE SUPREME COURT OF THE UNITED STATES

No. 17-1001

RAYMOND SEVERSON,

Petitioner.

v.

HEARTLAND WOODCRAFT, INC.

Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief of Petitioner contains 2,999 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.

Dated: March 5, 2018

Respectfully submitted,

SARAH M. KONSKY

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