## IN THE

## Supreme Court of the United States

CREDIT ONE BANK, N.A.,

Petitioner,

v.

ORRIN S. ANDERSON,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Noah A. Levine, a member of the bar of this Court, certify that the accompanying Reply Brief for Petitioner contains 2,962 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on August 15, 2018.

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