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August 6, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 17-587: MOUNT LEMMON FIRE DISTRICT V. JOHN GUIDO AND DENNIS

RANKIN

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief referenced above contains **5,974** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.

Principal