No. 17-742

In THE Supreme Court of the United States

MARY ANNE SAUSE,

PETITIONER,

v.

TIMOTHY J. BAUER, ET AL.,

RESPONDENTS.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioners contains 2,986 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: February 6, 2018

Kellam M. Conover