

No. 17-862

IN THE
Supreme Court of the United States

MARICOPA COUNTY, ET AL.

Petitioners,

v.

MANUELA VILLA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for the Petitioners in *Maricopa County v. Villa*, No. 17-862, complies with the word limitations, as it contains 2,565 words.

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

Date: April 9, 2018



Michael A. Carvin