## In the Supreme Court of the United States

Lamps Plus, Inc., Lamps Plus Centennial, Inc., Lamps Plus Holdings, Inc.,

Petitioners,

v.

FRANK VARELA,

Respondent.

## CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for Petitioners and a member of the Bar of this Court, certify pursuant to Rule 33.1(g) of the Rules of this Court that the Reply Brief for Petitioners in the above-captioned case contains 2,998 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

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