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 Lamps Plus, Inc. et al. and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that the Reply Brief for Petitioners in the above-captioned case contains 5,999 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

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