No. 18-1451

## IN THE Supreme Court of the United States

NATIONAL REVIEW, INC.,

Petitioner,

v.

MICHAEL E. MANN,

Respondent.

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I hereby certify that Petitioner's Reply in Support of Certiorari in *National Review, Inc. v. Mann*, No. 18-1451, complies with the word limitations, as it contains 3,000 words.

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

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Date: July 16, 2019

Michael A. Carvin