In The Supreme Court of the United States

Montanans for Community Development, Petitioner

v.

Jeffrey A. Mangan et al., Respondents

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

Supreme Court Rule 33.1(h) Certification

As required by Supreme Court Rule 33.1(h), I certify that the document filed with this certification (*Reply to Brief in Opposition*) contains 2568 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), according to the word-count function of the word-processing program used to prepare it.

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