IN THE

Supreme Court of the United States

ELIAS KIFLE AND ETHIOPIAN REVIEW, INC.,

Petitioners,

v.

JEMAL AHMED,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I declare that the Reply Brief of Petitioner contains 2,087 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on the 6th day of December 2018.

Christopher W. Dryer

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: 8

Notary Public

COLEEN PAIGE BINFORD NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires June 30, 2020

