

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 18-565

Citgo Asphalt Refining Company; Citgo Petroleum Corporation; Citgo East Coast  
Oil Corporation,

*Petitioners,*

v.

Frescati Shipping Company, Ltd.; Tsakos Shipping & Trading, S.A.; and United  
States,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief of Petitioners in the foregoing case contains 2,358 words, excluding the 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 March 19, 2019.

/s/ Carter G. Phillips  
CARTER G. PHILLIPS  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000