## IN THE SUPREME COURT OF THE UNITED STATES

## No. 18-774

## ANDERSON NEWS, L.L.C., CHARLES ANDERSON, JR., AND LLOYD T. WHITAKER, AS THE ASSIGNEE UNDER AN ASSIGNMENT FOR THE BENEFIT OF CREDITORS FOR ANDERSON SERVICES, L.L.C., *Petitioners*,

v.

AMERICAN MEDIA, INC., ET AL., Respondents.

## **CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 2,782 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 6, 2019.

Michael K. Kellogg Counsel of Record for Petitioners