
In the Supreme Court of the United States

ARLENE ROSENBLATT,

Petitioner,

v.

THE CITY OF SANTA MONICA *ET AL.*,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **REPLY BRIEF FOR PETITIONER** complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that this brief contains 2,992 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 April 16, 2020.

/s/ Robert L. Esensten

Robert L. Esensten

Counsel of Record