IN THE Supreme Court of the United States

JOSHUA BAKER, in his official capacity as Director, South Carolina Department of Health and Human Services,

Petitioner,

v.

PLANNED PARENTHOOD SOUTH ATLANTIC; JULIE EDWARDS,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,389 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d), and complies with the word limitation established by Supreme Court Rule 33.1(g)(iii).

Executed on September 14, 2020

JOHN J. BURSON

BURSCH LAW, PLLC

9339 Cherry Valley Ave SE #78

Caledonia, MI 49316

(616) 450-4235

jbursch@burschlaw.com