## IN THE

## Supreme Court of the United States

STEPHEN BUSCH, MICHAEL PRYSBY, LIANE SHEKTER SMITH, AND BRADLEY WURFEL, Petitioners,

v.

SHARI GUERTIN, ET AL.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioners contains 2,361 words, excluding the parts of the document 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).

Dated: January 7, 2020

John J. Bursch