

No. 19-435

IN THE
Supreme Court of the United States

SIH PARTNERS LLLP, EXPLORER CORPORATION,
TAX MATTERS PARTNER,

Petitioner,

v.

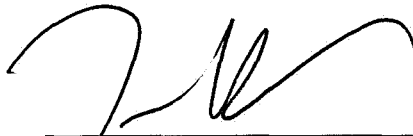
COMMISSIONER OF INTERNAL REVENUE,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 2,999 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: December 17, 2019



Thomas H. Dupree Jr.