In the Supreme Court of the United States

JOSEPH A. ZADEH & JANE DOE,

Petitioners,

v.

Mari Robinson, Sharon Pease & Kara Kirby,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for petitioners and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this reply brief contains 2,986 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Paul W. Hughes