## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-937

## THE CHEROKEE NATION,

Petitioner,

v.

## DAVID BERNHARDT, IN HIS OFFICIAL CAPACITY, ET AL.,

Respondents,

AND

## UNITED KEETOOWAH BAND OF CHEROKEE INDIANS IN OKLAHOMA, ET AL.,

Intervenors/Respondents.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief in the foregoing case contains 2,998 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 May 28, 2020.

/s/ Carter G. Phillips CARTER G. PHILLIPS SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8000