

No. 20-10

IN THE SUPREME COURT OF THE UNITED STATES

EMILY KOLLARITSCH ET AL.,
Petitioners,

v.

MICHIGAN STATE UNIVERSITY BOARD OF TRUSTEES

**CERTIFICATE OF COMPLIANCE
WITH WORD LIMITATIONS**

I, Daniel R. Ortiz, a member of the Bar of this Court and counsel for Petitioners, certify that this reply brief complies with the word limitations of Rules 33(d) & (g) of this Court. In particular, according to the word count feature of Microsoft Word, the word processing program used to prepare the document, the sections of the brief not excluded under Rule 33(d) contain 2972 words, including footnotes.

/s/ Daniel R. Ortiz
Daniel R. Ortiz

Dated: September 22, 2020