IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1034

NARKIS ALIZA GOLAN, PETITIONER

v.

ISACCO JACKY SAADA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Karen R. King, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,978 words, excluding the parts of the reply brief that are exempted by Rule 33.1(d).

Karen R. King

March 16, 2021