

Supreme Court of the United States United States Courts of Appeals

## **CERTIFICATE OF COMPLIANCE**

No. 20-1180

TERRITORY OF AMERICAN SAMOA,

Petitioner,

v.

NATIONAL MARINE FISHERIES SERVICE; UNITED STATES DEPARTMENT OF COMMERCE; NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION; KITTY SIMONDS, EXECUTIVE DIRECTOR OF WESTERN PACIFIC REGIONAL FISHERY MANAGEMENT COUNCIL; MICHAEL D. TOSATTO, REGIONAL ADMINISTRATOR FOR NOAA'S NATIONAL MARINE FISHERIES SERVICE PACIFIC ISLANDS REGIONAL OFFICE; WILBUR ROSS, SECRETARY OF COMMERCE; CHRIS OLIVER, ASSISTANT ADMINISTRATOR FOR FISHERIES,

Respondents.

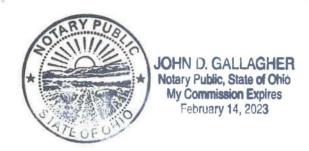
As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief of Petitioner contains 2,773 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 26, 2021.

Amy Triplett Morgan Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: May 26, 2021 John J. Dullo Notary Public [seal]



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