



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.



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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: May 26, 2021

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023