

CERTIFICATE OF COMPLIANCE

No. 20-1210

SENECA COUNTY, NEW YORK,

Petitioner,

v.

CAYUGA INDIAN NATION OF NEW YORK,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief contains 2,992 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.

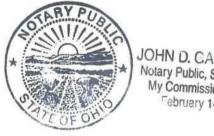
Executed on May 18, 2021.

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

Date: May 18, 2021 JUN, Duch Notary Public [seal]



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

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