



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.

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 18, 2021

John W. Dwyer
Notary Public

[seal]



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