IN THE Supreme Court of the United States

ANDALUSIAN GLOBAL DESIGNATED ACTIVITY COMPANY, ET AL.,

Petitioners,

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioners contains 3,000 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: October 27, 2020

Jeremy M. Christiansen