

IN THE  
**Supreme Court of the United States**

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FRANEK OLSTOWSKI,  
*Petitioner*

v.

PETROLEUM ANALYZER COMPANY, L.P.,  
*Respondent*

**CERTIFICATE OF COMPLIANCE**

I, Dylan B. Russell, counsel for Franek Olstowski, hereby certify that, according to the word-count tool in Microsoft Word, the Reply Brief of Franek Olstowski consists of 2613 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Reply Brief therefore complies with Rule 33.1(g).

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