

No. 20-1376

In the Supreme Court of the United States

MICHAEL ABATTI AND MIKE ABATTI FARMS, LLC,

Petitioners,

v.

IMPERIAL IRRIGATION DISTRICT,

Respondent.

CERTIFICATE OF WORD COUNT

I, H. Christopher Bartolomucci, a member of the Bar of this Court, hereby certify under Supreme Court Rule 33.1(h) that the Reply Brief for Petitioners complies with the word limitations in Supreme Court Rule 33.1(g). I further certify that the brief contains 2,962 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ H. Christopher Bartolomucci

H. CHRISTOPHER BARTOLOMUCCI

Counsel of Record

SCHAERR | JAFFE LLP

1717 K Street NW, Suite 900

Washington, DC 20006

(202) 787-1060

cbartolomucci@schaerr-jaffe.com

Counsel for Petitioners