

No. 20 -1400

In the
Supreme Court of the United States

MARK ELLIOTT, ET AL.,
Petitioners,

v.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the reply brief in support of certiorari contains 2,982 words, excluding the parts of the petition 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 June 21, 2021


Peter C. Hein