

In the Supreme Court of the United States

PATRICK DOUGHTY AND RANDY SEVERANCE,
Petitioners,

v.

STATE EMPLOYEES' ASSOCIATION OF NEW HAMPSHIRE,
SEIU LOCAL 1984, CTW, CLC,
Respondent.

**On Petition for Writ of Certiorari to the United States
Court of Appeals for the First Circuit**

REPLY BRIEF FOR THE PETITIONERS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century 12 point for the text and 10 point for the footnotes, and this brief contains 1,326 words, excluding the parts 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 24, 2021.

/s/ Frank D. Garrison

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