No. 20-157

## IN THE

## Supreme Court of the United States

EDWARD A. CANIGLIA,

Petitioner,

v.

ROBERT F. STROM, ETAL.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply in Support of Certiorari in *Caniglia v. Strom*, No. 20-157, complies with the word limitations, as it contains 3,000 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 27, 2020

Apthony J. Dick