

No. 20-208

IN THE
Supreme Court of the United States

LIBERTY MUTUAL FIRE INSURANCE COMPANY,
Petitioner,
v.
ETHAN VOLUNGIS, ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 2,492 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: January 5, 2021



Gregory J. Kerwin