

No. 20-208

IN THE  
**Supreme Court of the United States**

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LIBERTY MUTUAL FIRE INSURANCE COMPANY,  
*Petitioner,*

v.

ETHAN VOLUNGIS, ET AL.,  
*Respondents.*

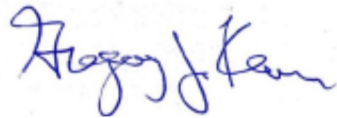
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**CERTIFICATE OF COMPLIANCE**

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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



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Gregory J. Kerwin