IN THE SUPREME COURT OF THE UNITED STATES

No. 20-257

CHIPOTLE MEXICAN GRILL, INC., AND CHIPOTLE SERVICES, LLC, PETITIONERS

v.

MAXCIMO SCOTT, ET AL.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for petitioners and a member of the Bar of this Court, certify that the Reply Brief for the Petitioners in the above-captioned case contains 2,960 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

November 17, 2020