## IN THE

## Supreme Court of the United States

KIERNAN J. WHOLEAN, JAMES A. GRILLO,

Petitioners,

v.

CSEA SEIU LOCAL 2001,

Respondent.

## On Petition for Writ of Certiorari to the United States Court of Appeals for the Second Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1, I, Milton L. Chappell, a member of the bar of this Court, certify that the Reply to Briefs in Opposition in the above entitled case complies: a) with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes; and b) with the word count requirement of Supreme Court Rule 33.1(h), in that this brief contains 873 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: March 4, 2021.

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