

No. 21-1360

IN THE
Supreme Court of the United States

MIKE KOWALL, ET AL., ,

Petitioners,

v.

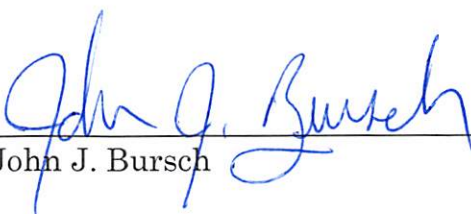
JOCELYN BENSON, IN HER OFFICIAL CAPACITY AS SECRETARY OF STATE,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioners contains 2,646 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), and complies with the word limitation established by Supreme Court Rule 33.1(g)(iii).

Dated: September 15, 2022



John J. Bursch