

No. 21-1394

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

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JOHN FITISEMANU, PALE TULI, ROSAVITA TULI,  
AND SOUTHERN UTAH PACIFIC ISLANDER COALITION,  
*Petitioners,*

v.

UNITED STATES OF AMERICA, *ET AL.*,  
*Respondents.*

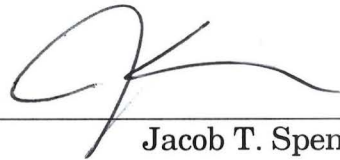
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CERTIFICATE OF COMPLIANCE

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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 Petitioners contains 2,999 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: September 14, 2022



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Jacob T. Spencer