IN THE

Supreme Court of the United States

SEATTLE'S UNION GOSPEL MISSION,

Petitioner,

V.

MATTHEW S. WOODS,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief of Petitioner contains 2,941 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on November 12, 2021.

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