No. 21-152

In The Supreme Court of the United States

ESTATE OF MADISON JODY JENSEN, EX REL. JARED JENSEN,

Petitioner,

v.

KENNON TUBBS,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply in Support of Certiorari in *Estate of Jensen ex rel. Jensen v. Tubbs*, No. 21-152, complies with the word limitations, as it contains 2,749 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: September 17, 2021

Anthony J. Dick