## In the Supreme Court of the United States

VIRGIN AMERICA, INC., AND ALASKA AIRLINES, INC.,

Petitioners,

v.

JULIA BERNSTEIN, ET AL.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that Petitioner's Reply in Support of Certiorari in *Virgin America, Inc., et al. v. Julia Bernstein, et al.*, S. Ct. No. 21-260, complies with the word limitations, because it contains 2999 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: October 6, 2021

Shay Dvoretzky