No. 21-560

IN THE Supreme Court of the United States

DAKOTA ACCESS, LLC,

Petitioner,

v.

STANDING ROCK SIOUX TRIBE, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 2,997 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: January 4, 2022

Miguel A. Estrada