In the Supreme Court of the United States

John C. Kitchin, Jr., Northwest Auto Body Co., and Mary Menke, on behalf of themselves and all others similarly situated, *Petitioners*,

v.

Bridgeton Landfill, LLC, Republic Services, Inc., Allied Services, LLC, and Rock Road Industries, Inc., Respondents.

> On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the Reply Brief contains 1,972 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on January 20, 2022.

Stuart Banner UCLA School of Law 405 Hilgard Ave. Los Angeles, CA 90095 (310) 206-8506 banner@law.ucla.edu Counsel for Petitioners