In The Supreme Court of the United States

GEORGE SHEETZ,

Petitioner,

v.

COUNTY OF EL DORADO,

Respondent.

On Petition for Writ of Certiorari to the California Court of Appeal, Third Appellate District

CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,929 words, excluding the parts of the document that are exempted by Rule 33.1(d).

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

Executed on July 19, 2023.

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