

No. _____

In The
Supreme Court of the United States

JOCELYN M. MURPHY, MICHAEL S. MURPHY, AND RICHARD C. GOUNAUD,
Petitioners,

v.

SECURITIES AND EXCHANGE COMMISSION,
Respondent.

CERTIFICATE OF WORD COUNT

I hereby certify on this 10th day of October, 2023, that the above referenced Reply Brief of Petitioner contains 2,894 words.

Respectfully submitted,

/s/ Russell G. Ryan
Russell G. Ryan
Counsel of Record
New Civil Liberties Alliance
1225 19th Street, NW
Suite 450
Washington, DC 20036
(202) 869-5210
russ.ryan@nclalegal.org

Counsel for Petitioner
Richard C. Gounaud