

Supreme Court of the United States United States Courts of Appeals

## **CERTIFICATE OF COMPLIANCE**

No. 22-1249

## FOREMOST TITLE & ESCROW SERVICES, LLC,

Petitioner,

v.

## FCOA, LLC,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief contains 2,527 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on August 30, 2023.

Erm

Emily Mullins Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: <u>August 30, 2023</u> <u>John & Ducch</u> Notary Public

[seal]



JOHN D. GALLAGHER Notary Public. State of Ohio My Commission Expires February 14, 2028