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September 14, 2023

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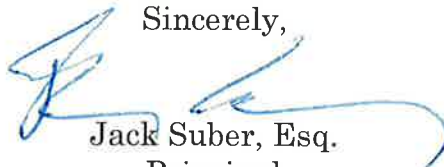
**RE 22-1251: SIMON V. KINSELLA V. U.S. BUREAU OF OCEAN ENERGY MANAGEMENT,  
ET AL. AND SOUTH FORK WIND, LLC**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Supplemental Brief to the Petition for Writ of Certiorari referenced above contains **2,963** 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.

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 14th day of September 2023.

