

No. 22-281

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**In the  
Supreme Court of the United States**

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IN RE BABY BOY DOE, MINOR

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PETER KRUTHOFF

*Petitioner,*

v.

CATHOLIC CHARITIES WEST MICHIGAN,

and

ADOPTIVE PARENTS 1 & 2,

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

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As required by supreme Court Rule 33.1(h), I certify that the accompanying *Reply to Brief in Opposition* in this matter contains 2999 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

I declare under the penalty of perjury that the foregoing is true and correct based upon the count of words by my word processing system.

/s/ Saraphoena B. Koffron

Saraphoena B. Koffron

U.S. Supreme Court Bar No. 316347

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*executed on November 9, 2022*