No. 22-324

IN THE

Supreme Court of the United States

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

Petitioners,

V.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioners in *O'Connor-Ratcliff v. Garnier*, No. 22-324, complies with the word limitations, as it contains 5,996 words.

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

Date: September 7, 2023

Hashim M. Mooppan