

IN THE SUPREME COURT OF THE UNITED STATES

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No. 22-703

AMERICAN PETROLEUM INSTITUTE, ET AL., PETITIONERS

v.

ENVIRONMENTAL DEFENSE CENTER, ET AL.

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for petitioners and a member of the Bar of this Court, certify that the Reply Brief for the Petitioners in the above-captioned case contains 2,992 words, excluding the portions that are exempted by Rule 33.1(d).

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Kannon K. Shanmugam

May 16, 2023