No. 22-720

In the

Supreme Court of the United States

DAKOTA FINANCE LLC, d/b/a Arabella Farm; KEN SMITH; SHARON SMITH; WILLARD R. LAMNECK, JR.,

Petitioners,

v.

NATURALAND TRUST; SOUTH CAROLINA TROUT UNLIMITED; UPSTATE FOREVER,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,984 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.

Executed on April 13, 2023.

FRANK D. GARRISON Counsel of Record Pacific Legal Foundation 3100 Clarendon Blvd., Suite 1000 Arlington, VA 22201 Telephone: (202) 888-6881 FGarrison@pacificlegal.org

Counsel for Petitioners