

Case No.: 22-80

SUPREME COURT OF THE UNITED STATES  
CERTIFICATE OF COMPLIANCE

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DETECTIVE, #314 FRANK NAPOLITANO  
and FRANCIS JOSEPH MCGEOUGH,

*Petitioners,*

v.

LAURENCE WASHINGTON,

*Respondent.*

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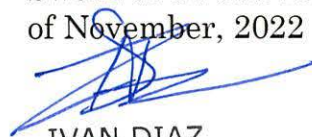
As Required by Supreme Court Rule 33.1(g)(h), I certify that the REPLY BRIEF FOR PETITIONERS contains 2,875 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Dated: November 10, 2022

  
Nikolina Gurfinkel

Sworn to on this 10th day  
of November, 2022



IVAN DIAZ  
Notary Public, State of New York  
No. 01DI6435046  
Qualified in Bronx County  
Commission Expires June 21, 2026