

No. 23-184

In the Supreme Court of the United States

KAREN M. SUBER,

Petitioner,

v.

VVP SERVICES, LLC, et al,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in Support of Certiorari contains 2,996 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 this 24th day of October 2023.

/s/ Amos N. Jones

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