

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-325

South Carolina State Ports Authority, and State of South Carolina,

Petitioners,

v.

National Labor Relations Board, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief in the foregoing case 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 December 20, 2023.

/s/ Carter G. Phillips
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