

No. 23-61

IN THE
Supreme Court of the United States

MARTIN E. O'BOYLE, JONATHAN O'BOYLE, AND
WILLIAM RING,
PETITIONERS,

V.

TOWN OF GULF STREAM,
RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners contains 2,964 words, excluding the parts of the Reply Brief for Petitioners 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 November 7, 2023.

/s/ Kim M. Watterson
Kim M. Watterson
Counsel of Record