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February 9, 2024

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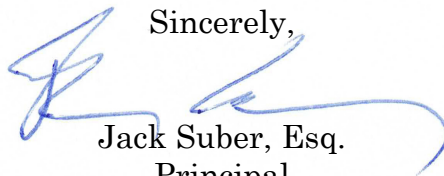
**RE 23-703 (VIDE 23-550): LIBERTY UNIVERSITY, INC. V. LAURA BARBOUR BOWES,
AS EXECUTOR OF THE ESTATE OF EVA PALMER**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Conditional Cross-Petitioner's Reply Brief referenced above contains **2,739** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 9th day of February 2024.

