

# LEGAL PRINTERS LLC

202-747-2400  
202-449-9565 Fax  
LegalPrinters.com

5614 Connecticut Avenue, NW #307  
Washington, DC 20015

February 9, 2024

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

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

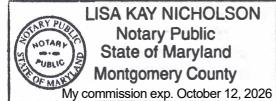
Dear Sir or Madam:

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.

Lisa K. Nicholson