In the Supreme Court of the United States

CITY OF COSTA MESA, CALIFORNIA, $Petitioner,\\v.$ SoCal Recovery, LLC, et al., Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 33.1(h), I hereby certify that this Petitioner's Reply Brief contains 2,999 words as counted by Microsoft Word, excluding the parts of the document exempted by Rule 33.1(d), and therefore complies with the word count limits set out in Rule 33.

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