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IN THE SUPREME COURT OF THE UNITED STATES

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Julian R. Ash,

Petitioner

v.

OPM,

Respondent

CERTIFICATE OF COMPLIANCE WITH WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 3,139 words, excluding the parts of the brief that were exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on May 16, 2024.