

No. 24-6921

In the Supreme Court of the United States

BENJAMIN KOHN,

Petitioner,

v.

STATE BAR OF CALIFORNIA ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioner contains 2741 words, excluding the parts of the petition 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 July 31, 2025

/s/ Andrew Rozynski

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