

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 24-908

FANE LOZMAN,

Petitioner,

v.

CITY OF RIVIERA BEACH, FLORIDA,,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Petitioner's Reply Brief in the foregoing case contains 3,000 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.

Executed on May 12, 2025.

/s/ Tobias S. Loss-Eaton
TOBIAS S. LOSS-EATON
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8291
tlosseaton@sidley.com