

## **CERTIFICATE OF COMPLIANCE**

Under Supreme Court Rule 37, I, KATELYN N. RINGROSE, hereby certify that, based on the software in the Microsoft Word program used to prepare this document, this reply brief uses Century font and contains 5,762 words, excluding the cover page, tables of content and authorities, and signature block.

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Respectfully submitted, MCDERMOTT WILL & EMERY LLP

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