IN THE SUPREME COURT OF THE UNITED STATES

Tri-State Zoological Park of Western Maryland, Inc., Animal Park, Care & Rescue, Inc., and Robert L. Candy

Petitioners,

V.

People for the Ethical Treatment of Animals, Inc.

Respondent.

CERTIFICATION OF COMPLIANCE WITH RULE 33.1

Now comes the undersigned, counsel of record for the Petitioner and a member of the bar of this Court, and hereby certifies that the Petition for Certiorari filed in this case complies with the typeface and word count requirements of Rule 33.1, in that the font is Century Schoolbook, 12 point font for the text and 10 point font for footnotes, and contains 8648 words including footnotes, excepting those portions not required to be counted by Rule 33.1. LYNNT. KRAUSE

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