

No. 20-1183

---

**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 Reply Brief in Support of 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, contains no footnotes, and contains 1445 words, excepting those portions not required to be counted by Rule 33.1.



---

LYNN T. KRAUSE

*Counsel of Record*

KAGAN, STERN,

MARINELLO

& BEARD, LLC

238 West Street

Annapolis, MD 21401

443-994-0403

krause@kaganstern.com

6/25/21

---

Date