

No. 20-47

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In the  
Supreme Court of the United States

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LEBAMOFF ENTERPRISES, INC., ET AL.

*Petitioners,*

v.

GRETCHEN WHITMER, GOVERNOR OF MICHIGAN, ET AL.

*Respondents.*

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CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33(1)(h), I certify that the Reply Brief of Petitioners complies with the word limitations in Rule 33(1)(g). It contains 1858 words, including footnotes, but excluding sections exempted from the word count by Rule 33(1)(d).

This the 18th day of November, 2020.

s/ James A. Tanford

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