

December 1, 2020

Clerk of the Court  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20543

**Re: Bridge Aina Le'a v. State of Hawaii**

Dear Sirs,

Pursuant to Rule 33.1(d), this certifies that the word count in the Reply in Support of Petition for a Writ of Certiorari has been certified by the word count system on counsel's computer as containing 2,993 words (including footnotes).

Respectfully submitted,

*s/ Michael M. Berger*

Michael M. Berger  
Counsel of Record for Petitioner

MMB:bah

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