

No. 22-324

---

IN THE  
**Supreme Court of the United States**

---

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

*Petitioners,*

v.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

*Respondents.*

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *O'Connor-Ratcliff v. Garnier*, No. 22-324, complies with the word limitations, as it contains 2,996 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 20, 2022

  
\_\_\_\_\_  
Hashim M. Mooppan