

In The  
**Supreme Court of the United States**

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CHELSEA KOETTER,

*Petitioner,*

v.

MANISTEE COUNTY TREASURER,

*Respondent.*

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*On Petition For A Writ Of Certiorari  
To The Michigan Court Of Appeals*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF THE PETITION FOR A WRIT OF CERTIORARI contains 2,969 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on August 22, 2025.

*s/ Christina M. Martin*

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