

IN THE
Supreme Court of the United States

TERRY KLEE,

Petitioner,

v.

INTERNATIONAL UNION OF OPERATING ENGINEERS,
LOCAL 51, an employee organization; CALIFORNIA
DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
public agency; BETTY T. YEE, in her official capacity as
California State Controller; ROB BONTA, in his official
capacity as Attorney General of California,

Respondents.

**On Petition for Writ of Certiorari to the
United States Court of Appeals for the Ninth
Circuit**

REPLY BRIEF FOR PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,987 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.

Sworn to and subscribed before me this 29th day of October 2025.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.

