

No. 25-1163

In The
Supreme Court of the United States

CARLOS PENA,

Petitioner,

v.

CITY OF LOS ANGELES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply in Support of Certiorari in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the petition complies with the word limit of Supreme Court Rule 33.1(g). It contains 2,997 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: June 23, 2026

/s/ Jeffrey Redfern

JEFFREY REDFERN

Counsel of Record

INSTITUTE FOR JUSTICE

901 N. Glebe Rd., Ste. 900

Arlington, VA 22203

(703) 682-9320

jredfern@ij.org