## IN THE

## Supreme Court of the United States

MICHAEL KANE, et al.,

Petitioners,

v.

CITY OF NEW YORK, NEW YORK, et al.,

Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners contains 2,857 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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