In The

Supreme Court of the United States

JOHANNA MCGEE, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF JACQUELINE MCGEE,

Petitioner,

υ.

ALGER COUNTY TREASURER,

Respondent,

LILLIAN JOSEPH

Petitioner,

v.

IRON COUNTY TREASURER,

Respondent.

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

CERTIFICATE OF COMPLIANCE

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 2,997 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 November 19, 2025.

s/ Christina M. Martin
CHRISTINA M. MARTIN
Counsel of Record
Pacific Legal Foundation
4440 PGA Blvd., Suite 307
Palm Beach Gardens, FL 33410
Telephone: (916) 330-4059
CMartin@pacificlegal.org
Counsel for Petitioners