

No. 25-31

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IN THE  
**Supreme Court of the United States**

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BENJAMIN ADAMS,

*Petitioner,*

v.

LLOYD ARNOLD, *et al.*,

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Adams v. Arnold*, No. 25-31, complies with the word limitations, as it contains 2,994 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: September 23, 2025

  
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Anthony J. Dick