

No. 25-451

In The
Supreme Court of the United States

FAYTIMA HOWARD,
Petitioner,

v.

MACOMB COUNTY,
Respondent.

*On Petition For A Writ Of Certiorari To The
United States Court Of Appeals For The Sixth Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR A WRIT OF CERTIORARI contains 2,994 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 December 19, 2025.

s/ Christina M. Martin
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