

IN THE
Supreme Court of the United States

No. 25-464

PHILIP G. POTTER,
Petitioner,
v.

INCORPORATED VILLAGE OF OCEAN BEACH, ET AL.,
Respondents.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Second Circuit**

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Reply Brief in Support of Certiorari contains 2,297 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on January 20, 2026.



EUGENE A. SOKOLOFF

Counsel of Record

MOLOLAMKEN LLP
300 North LaSalle Street
Chicago, IL 60654
(312) 450-6718
esokoloff@mololamken.com

Counsel for Petitioner