

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

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NO. 25-464

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PHILIP G. POTTER,  
*Petitioner,*  
v.

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

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

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**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.



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