

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

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DONNA ELIZABETH SUMMERS, PETITIONER,

*v.*

STATE OF MONTANA, RESPONDENT.

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
SUPREME COURT OF THE STATE OF MONTANA

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**REPLY BRIEF FOR PETITIONER**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,999 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.

Sworn to and subscribed before me this 3rd day of March 2026.

  
\_\_\_\_\_  
AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.

