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No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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UNIFIED LIFE INSURANCE COMPANY,  
Petitioner,

*v.*

UNITED STATES FIRE INSURANCE COMPANY,  
Respondent.

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**CERTIFICATE OF COMPLIANCE**

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Pursuant to S. Ct. R. 33.1(h), I certify that the petition for writ of certiorari contains 3,098 words, excluding parts exempted by S. Ct. R. 33.1(d).

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

Executed on December 8, 2025

/s/ Huang Tiange  
Huang Tiange  
*President*  
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