## In the Supreme Court of the United States

ERICA HUSS, PETITIONER

v.

## LOREN ROBINSON

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

## CERTIFICATE OF COMPLIANCE

Attorney for Petitioner Erica Huss hereby certifies that the foregoing REPLY BRIEF complies with the type-volume limitation of Supreme Court Rule 33.1(g)(iii), in that the word-processing system used to prepare the brief indicates that the brief contains 2,489 words.

Respectfully submitted,

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