No. 23-1228

## In the Supreme Court of the United States

MASON MURPHY,

Petitioner,

v.

MICHAEL SCHMITT, OFFICER, SUED IN HIS INDIVIDUAL CAPACITY,

Respondent.

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I, Marie Miller, counsel of record for Petitioner and a member of the Bar of this Court, certify that the Reply in Support of Certiorari in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the brief complies with the word limit of Supreme Court Rule 33.1(g). It contains 2,928 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

September 9, 2024

PATRICK JAICOMO ANYA BIDWELL INSTITUTE FOR JUSTICE 901 N. Glebe Rd., Ste. 900 Arlington, VA 22203 <u>s/ Marie Miller</u> MARIE MILLER *Counsel of Record* INSTITUTE FOR JUSTICE 3200 N. Central Ave., Ste. 2160 Phoenix, AZ 85012 (480) 557-8300 mmiller@ij.org

Counsel for Petitioner