

IN THE
Supreme Court of the United States

LEWIS COUNTY, KENTUCKY, ET AL.,

Petitioners,

v.

JULIE HELPHENSTINE,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Reply Brief for Petitioners contains 2,996 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed December 29, 2023.

/s/ R. Trent McCotter _____
R. Trent McCotter
Counsel of Record