In The Supreme Court of the United States

BOWERS DEVELOPMENT, LLC,

Petitioner,

v.

ONEIDA COUNTY INDUSTRIAL DEVELOPMENT AGENCY, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I hereby certify that the Reply in Support of the Petition for a Writ of Certiorari contains 2,987 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), and that it complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12-point font for the text and 10-point font for the footnotes. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of February 2025.

/s/ Robert J. McNamara

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