

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

\_\_\_\_\_  
JAKE'S FIREWORKS INC.,

*Petitioner,*

v.

U.S. CONSUMER PRODUCT SAFETY COMMISSION; ET AL.,

*Respondents.*

\_\_\_\_\_  
*On Petition For A Writ Of Certiorari To The  
United States Court of Appeals For The Fourth Circuit*

**CERTIFICATE OF COMPLIANCE**

\_\_\_\_\_  
As required by Supreme Court Rule 33.1(h), I certify that the  
REPLY BRIEF FOR PETITIONER contains 2,863 words, excluding the  
parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on March 24, 2025.

s/ Oliver J. Dunford

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