

No. 18-1506

IN THE
Supreme Court of the United States

JULIAN MARTIN,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Martin v. United States*, No. 18-1506, complies with the word limitations, as it contains 1,813 words.

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



Ilana Gelfman

Date: September 27, 2019