No. 18-496

IN THE

Supreme Court of the United States

BARRY MICHAELS,

Petitioner,

υ.

MATTHEW G. WHITAKER,
ACTING ATTORNEY GENERAL OF THE UNITED STATES,
AND THOMAS E. BRANDON, AS DEPUTY DIRECTOR,
HEAD OF THE BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES,

Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), the undersigned certifies that the Reply Brief for Petitioner complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 2,905 words. (The undersigned is relying on the word-count utility in Microsoft Word 2016, the word-processing system used to prepare the brief, consistent with Rule 33.1(d).)

Thomas C. Goldstein December 21, 2018