

**IN THE  
SUPREME COURT OF THE UNITED STATES**

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**JEREMIAH DAVIS,**

Petitioner,

vs.

**UNITED STATES OF AMERICA,**

Respondent.

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**On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit**

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**CERTIFICATE OF WORD COUNT**

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The undersigned hereby certifies that the Reply Brief for the Petitioner complies with the requirements of the type-volume limitation of Rule 33.1(g)(i), Supreme Court Rules, as it contains 1,130 words, excluding the table of contents, table of citations, and the certificates of counsel. Certification is based on the word count of the word-processing system used in preparing this Reply, Microsoft Word 2016.

This the 28th day of February, 2019.

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