## IN THE

## Supreme Court of the United States

CLYDE S. BOVAT,

Petitioner,

v.

STATE OF VERMONT,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Vermont

## REPLY BRIEF IN SUPPORT OF CERTIORARI

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,901 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 July 22, 2020.

Colin Casey Hogan

Wilson-Epes Printing Co., Inc.