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No. 19-273

MICHAEL BINDAY,  
Petitioner,

v.

UNITED STATES OF AMERICA,  
Respondent.

#### **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the REPLY BRIEF in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2997 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 17th day of January, 2020.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.

PATRICIA BILLOTTE  
General Notary  
State of Nebraska

My Commission Expires Nov 24, 2020

*Patricia C. Billotte* *Andrew H. Cockle*  
\_\_\_\_\_  
Notary Public \_\_\_\_\_ Affiant