

In the Supreme Court of the United States

PATRICK EMANUEL SUTHERLAND,

Petitioner,

v.

UNITED STATES OF AMERICA

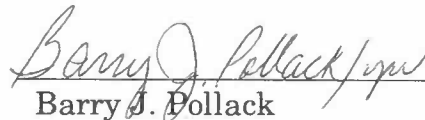
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Barry J. Pollack, a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,984 words, excluding the parts of the brief 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 this 21st day of January, 2020.


Barry J. Pollack