



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
+1 202 736 8000
+1 202 736 8711 FAX

+1 202 736 8000
CPHILLIPS@SIDLEY.COM

AMERICA • ASIA PACIFIC • EUROPE

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 19-6249

Michael Terrill Faircloth,

Petitioner

v.

United States,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Reply Brief of Petitioner in the foregoing case contains 1,346 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2020.

CARTER G. PHILLIPS
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000
jgreen@sidley.com