IN THE

Supreme Court of the United States

EDWIN ARTHUR AVERY,

Petitioner,

v.

UNITED STATES,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Thomas G. Sprankling, a member of the bar of this Court, certify that the accompanying Reply Brief for Petitioner contains 2,951 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on February 12, 2020.

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