

## **CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief, which was prepared using Century Schoolbook 12-point typeface, contains 3,119 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

DATED this 22nd day of June 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Filipovic", written over a horizontal line.

Michael Filipovic  
Federal Public Defender  
*Counsel for Petitioner*