## IN THE

## Supreme Court of the United States

AGUSTO NIZ-CHAVEZ,

Petitioner,

v.

WILLIAM P. BARR, ATTORNEY GENERAL,

Respondent.

On 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, David J. Zimmer, counsel of record and a member of the Bar of this Court, certify this 26th day of October, 2020, that the Reply Brief for Petitioner contains 6,000 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

October 26, 2020

David J. Zimmer

GOODWIN PROCTER LLP

100 Northern Ave.

Boston, MA 02210

dzimmer@goodwinlaw.com

(617) 570-1000

Counsel for Petitioner