No. 20-1298

In The Supreme Court of the United States

DEMETREUS KEAHEY,

Petitioner,

v.

DAVE MARQUIS,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief in Support of Certiorari in *Keahey v. Marquis*, No. 20-1298, complies with the word limitations, as it contains 2,995 words.

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

Date: June 29, 2021

Andrew J. M. Bentz