

No. 20-1479

IN THE
Supreme Court of the United States

EDDIE HOUSTON, JR.,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 4th day of August 2021, that the Reply Brief for Petitioner in the above-captioned case contains 2,991 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher

Jeffrey L. Fisher