

No. 20-163

**In the Supreme Court of the United States**

BRETT C. LILLEMoe,  
*Petitioner,*

v.


UNITED STATES OF AMERICA,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Reply In Support of Petition For Certiorari for Brett C. Lillemoe as Petitioner contains 2,999 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on November 11, 2020.

  
\_\_\_\_\_  
ALEXANDRA A.E. SHAPIRO  
SHAPIRO ARATO BACH LLP  
500 Fifth Avenue  
40th Floor  
New York, NY 10110  
(212) 257-4880  
ashapiro@shapiroarato.com

*Counsel for Petitioner Brett  
C. Lillemoe*