

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.

A. A. S.

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