IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1732

THOMAS BRYANT, JR., PETITIONER

V.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,015 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

November 8, 2021