## Supreme Court of the United States

JAMES AVERY, JR.,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I Mark C. Fleming, a member of the bar of this Court, certify that the accompanying Reply Brief for Petitioner contains 2,729 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on December 30, 2020.

Mente CHemme non

MARK C. FLEMING WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 (617) 526-6000 mark.fleming@wilmerhale.com