

No. 20-5064

IN THE SUPREME COURT OF THE UNITED STATES

TONY BROWN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

Certificate of Compliance

As required by Supreme Court Rule 33.2(b), I certify that the Reply Brief for Petitioner is less than 15 pages and 3,000 words.

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

Executed on December 21, 2020.

/s John C. Lemon

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