

IN THE

# Supreme Court of the United States

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STEVEN BAXTER,  
Petitioner,

v.

UNITED STATES OF AMERICA,  
Respondent.

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## CERTIFICATE OF WORD COUNT

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As required by Supreme Court Rule 33.1(h), I certify that the reply brief contains 2,998 words, excluding the parts of the reply brief that are exempted by Supreme Court Rule 33.1(d).

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

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