

No. 20-5264

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IN THE SUPREME COURT OF THE UNITED STATES

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LAKENTO BRIAN SMITH, Petitioner,

v.

UNITED STATES OF AMERICA, Respondent,

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CERTIFICATE OF WORD COUNT

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The Reply Brief for Petitioner complies with the word limitations of  
Sup. Ct. R. 33. The reply brief contains 1,780 words.

Dated: November 4, 2020

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