

IN THE
Supreme Court of the United States

DREW SAMUEL BATES,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Reply Brief for the Petitioner in case contains 2,952 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on the 2nd day of February 2021.



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