

IN THE
Supreme Court of the United States

RODNEY LAVALAIS,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief of Petitioner Rodney Lavalais, which was prepared using Century Schoolbook 12-point typeface, contains 1,930 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the wordprocessing system (Microsoft Word) used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 14th day of October, 2020.

/s/ Celia C. Rhoads
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