

No. 20-5489

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IN THE  
**Supreme Court of the United States**

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RODNEY LAVALAIS,  
*Petitioner,*  
*v.*

UNITED STATES OF AMERICA,  
*Respondent.*

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**CERTIFICATE OF WORD COUNT**

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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 14<sup>th</sup> day of October, 2020.

/s/ Celia C. Rhoads  
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