

IN THE
Supreme Court of the United States

JAMES ANTHONY MARTIN,
Petitioner,
v.

COMMONWEALTH OF MASSACHUSETTS,
Respondent.

On Petition for a Writ of Certiorari
to the Supreme Judicial Court of Massachusetts

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 17th day of February, 2021, that the Reply Brief for Petitioner contains 2,996 words, excluding the 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.

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