

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 20-6484

Willie Tyler,

*Petitioner*

v.

United States,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Quin M. Sorenson, certify that the Reply Brief of Petitioner in the foregoing case contains 2,416 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

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

Executed on April 21, 2021.

/s/ Quin M. Sorenson

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