

No. 20-6569

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 2020

QUINCEY FRYE,
Petitioner

v.

UNITED STATES OF AMERICA,
Respondent

CERTIFICATE OF WORD COUNT

I certify that the reply to Government’s memorandum regarding petition for a writ of certiorari filed on February 8, 2021, complies with the requirements of Rule 33(2)(b) and 33(1)(g)(i) of the Rules of the Supreme Court. The reply consists of 2 pages and 154 words, not counting those portions excluded in Rule 33(1)(d).

Dated: Buffalo, New York
February 8, 2021

Respectfully submitted,

/s/Martin J. Vogelbaum

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