

No. 20-6802

---

IN THE  
SUPREME COURT OF THE UNITED STATES

---

NOEL JONES,  
*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 Noel Jones contains 1,998 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 word-processing system (Microsoft Word) used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 11th day of May, 2021.

/s/ Samantha Kuhn  
SAMANTHA J. KUHN  
Assistant Federal Public Defender  
*Counsel of Record*  
Office of the Federal Public Defender  
500 Poydras Street, Suite 318  
Hale Boggs Federal Building  
New Orleans, Louisiana 70130  
(504) 589-7930  
samantha\_kuhn@fd.org

*Counsel for Petitioner*