

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-7460

Carlos Rodriguez Fernandez,

Petitioner

v.

United States,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Donna Lee Elm, certify that the Reply Brief of Petitioner in the foregoing case contains 2,981 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 June 8, 2021.

/s/ J. Donna Lee Elm

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