

**No. 20-7701**

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**IN THE  
SUPREME COURT OF THE UNITED STATES**

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**SAMUEL ALEX GANN,**

Petitioner,

vs.

**UNITED STATES OF AMERICA,**

Respondent.

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**CERTIFICATE OF WORD COUNT**

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The undersigned hereby certifies that the Reply complies with the requirements of the type-volume limitation of Rule 33.1(g)(iii), Supreme Court Rules, as it contains 2,964 words, excluding the table of contents, table of citations, and the certificates of counsel. Certification is based on the word count of the word-processing system used in preparing this Reply, Microsoft Word.

This the 12th day of July, 2021.

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