No. 20-886

THELMA G. MCCOY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2994 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

> /s/ Daniel A. Rubens Counsel of Record