IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1052

UNITED STATES OF AMERICA, EX REL. JESSE POLANSKY, M.D., M.P.H., PETITIONER

v.

EXECUTIVE HEALTH RESOURCES, INC., ET AL.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 3,000 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

> /s/ Daniel L. Geyser Daniel L. Geyser

May 18, 2022