## CERTIFICATE OF WORD COUNT

## No. 21-1214

	State of Oklahoma,	
		Petitioner,
	V.	
	Emmitt G. Sam,	
		Respondent
STATE OF MASSACHUSETTS )		
COUNTY OF NORFOLK ) SS.:		

Being duly sworn, I depose and say:

- 1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.
- 2. That, as required by Supreme Court Rule 33.1(h), I certify that the OKLAHOMA V. SAM REPLY BRIEF OF PETITIONER contains 177 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Lucas DeDeus

May 25, 2022