

No. 21-1384
In the
Supreme Court of the United States

STATE OF FLORIDA,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Henry C. Whitaker, counsel of record for Petitioner and a member of the Bar of this Court, certify that the Reply Brief for Petitioner in this case contains 2,764 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Henry C. Whitaker
Counsel of Record

September 6, 2022