

No. 21-1543

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Reply Brief for Petitioner complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,997 words, based on the word-count function of Microsoft Word, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read 'A. Losey', with a stylized flourish at the end.

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