

No. 21-171

---

IN THE  
**Supreme Court of the United States**

---

JOEL ZUPNIK,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

---

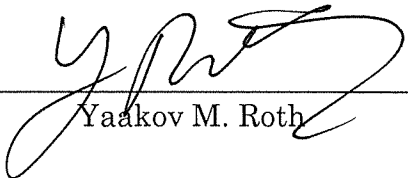
**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Zupnik v. United States*, No. 21-171, complies with the word limitations, as it contains 2,983 words.

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

Date: November 10, 2021

  
\_\_\_\_\_  
Yaakov M. Roth