

No. 21-374

**In the Supreme Court of the United States**

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STEVEN EDWARD STRUVE, PETITIONER,

v.

STATE OF IOWA

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On Petition for a Writ of Certiorari  
to the Supreme Court of Iowa

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**REPLY BRIEF FOR PETITIONER**

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As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 2,988 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 1, 2021.



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Jeremy C. Marwell  
Counsel for Petitioner