

IN THE  
SUPREME COURT OF THE UNITED STATES

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MICHAEL CARTER,  
*Petitioner,*  
v.

UNITED STATES OF AMERICA,  
*Respondent.*

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**CERTIFICATE OF WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief of Petitioner Michael Carter contains 2,037 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 17th day of November, 2021.

/s/ Samantha Kuhn  
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