

No. 21-5047

IN THE
SUPREME COURT OF THE UNITED STATES

MICHAEL CARTER,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

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
SAMANTHA J. KUHN
ASSISTANT FEDERAL PUBLIC DEFENDER
Counsel of Record
500 Poydras Street, Suite 318
Hale Boggs Federal Building
New Orleans, Louisiana 70130
(504) 589-7930
samantha_kuhn@fd.org

Counsel for Petitioner