

IN THE
Supreme Court of the United States

DAWN J. BENNETT,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Fourth Circuit

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Reply to the Brief in Opposition to the Petition for a Writ of Certiorari contains no more than 3,000 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 November 12, 2021.

/s/Eric J. Brignac
ERIC J. BRIGNAC
CHIEF APPELLATE ATTORNEY
OFFICE OF THE FEDERAL PUBLIC DEFENDER
EASTERN DISTRICT OF NORTH CAROLINA
150 Fayetteville St., Suite 450
Raleigh, N.C. 27601
(919) 856-4236
Eric_Brignac@fd.org
Counsel for Petitioner