

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
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