

IN THE
Supreme Court of the United States

JOHN J. WATFORD,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the **Reply Brief for the Petitioner** in this case contains 2,045 words, excluding 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 the 22nd day of December 2021.

/s/ John Gleeson

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