

Supreme Court of the United States
Certificate of Compliance

Re: *State of Wisconsin v. Mitchell L. Christen*
Case No. 21-5905

I hereby certify that the length of the length of the Reply Brief is 12 pages, in compliance with Supreme Court Rule 33.2(b), excepting the portions of this brief excluded by Supreme Court Rule 33.1(d)

Dated: Wednesday, January 26, 2022
Respectfully submitted,



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