No. 21-605

IN THE

Supreme Court of the United States

DAVID LYNN ROBERSON,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Roberson v. United States*, No. 21-605, complies with the word limitations, as it contains 2,973 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 11, 2022

Yaakov M. Roth