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No. 21-975

STATE OF IDAHO,
Petitioner,
v.
AARON JAMES HOWARD,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY BRIEF FOR PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2997 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 16th day of August, 2022.
I am duly authorized under the laws of the State of Nebraska to administer oaths.



Renee J. Goss

Notary Public

Andrew H. Cockle

Affiant