

In the Supreme Court of the United States

No. 22-177

MONICA TOTH, PETITIONER,

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel Gedge, a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,994 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: December 12, 2022.

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