

No. 22-49

IN THE
Supreme Court of the United States

EFRAIN LORA,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Lora v. United States*, No. 22-49, complies with the word limitations, as it contains 5,948 words.

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

Date: March 17, 2023


Andrew J.M. Bentz