

NO: 22-5549

IN THE  
SUPREME COURT OF THE UNITED STATES

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EMMANUEL MAXIME,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I, Sara W. Kane, hereby certify that the petitioner's reply brief in the foregoing case contains 2,996 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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