IN THE

Supreme Court of the United States

EUGENE JACKSON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,133, words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 27, 2023

/s/ Douglas E. Litvack Douglas E. Litvack