IN THE

## Supreme Court of the United States

SITU KAMU WILKINSON,

Petitioner,

v.

MERRICK B. GARLAND, ATTORNEY GENERAL, Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Third Circuit

## CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 17th day of November, 2023, that the Reply Brief for Petitioner contains 5,998 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.

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