

No. 22-685

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IN THE  
**Supreme Court of the United States**

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JERRY WAYNE WILKERSON, *et al.*,

*Petitioners,*

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 hereby certify that the Reply Brief for Petitioners in *Wilkerson v. United States*, No. 22-685, complies with the word limitations, as it contains 2,994 words.

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

Date: May 15, 2023



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Charles E.T. Roberts