No. 22-766

IN THE Supreme Court of the United States

EDWARD PINKNEY,

Petitioner,

v.

BERRIEN COUNTY, MICHIGAN; BERRIEN COUNTY PROSECUTOR,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to

Brief in Opposition in Pinkney v. Berrien County, No. 22-766, complies with the word

limitations, as it contains 1,988 words.

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

Date: March 28, 2023

Stephen J. Kenny