## In the Supreme Court of the United States

No. 22-899

JASON SMITH, Petitioner,

v.

STATE OF ARIZONA,

Respondent.

On Writ of Certiorari to the Court of Appeals of the State of Arizona, Division One

## **CERTIFICATE OF WORD COUNT RE: REPLY BRIEF FOR THE PETITIONER**

I HEREBY CERTIFY, pursuant to Supreme Court Rule 33.1(h), that the foregoing REPLY BRIEF FOR THE PETITIONER contains 5,994 words, as indicated by the word processing software used to prepare it, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

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

Executed on December 29, 2023

Hari Santhanam Counsel of Record Perkins Coie LLP 110 North Wacker Drive Suite 3400 Chicago, IL 60606 (312) 324-8447 HSanthanam@perkinscoie.com