## In the Supreme Court of the United States

No. 23-108

JAMES E. SNYDER, PETITIONER

v.

UNITED STATES OF AMERICA, RESPONDENT

## CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for petitioner James E. Snyder and a member of the Bar of this Court, certify that the Reply Brief for Petitioner in the above-captioned case contains 2,996 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt Lisa S. Blatt

November 21, 2023