

**In the Supreme Court of the United States**

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JEFFREY BATIO,

*Petitioner,*

*v.*

UNITED STATES OF AMERICA,

*Respondent*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Seventh Circuit

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,985 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.

Executed on October 1, 2024

/s/ Andrew T. Dufresne

Andrew T. Dufresne

Perkins Coie LLP