

No. 23-370

IN THE
Supreme Court of the United States

PAUL ERLINGER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 3rd day of January, 2024, that the Brief for Petitioner in the above-captioned case contains 10,767 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher
Jeffrey L. Fisher