IN THE

Supreme Court of the United States

NATOYA CUNNINGHAM,

Petitioner,

v.

STATE OF FLORIDA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE FLORIDA DISTRICT COURT OF APPEAL, FOURTH DISTRICT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Seth P. Waxman, a member of the bar of this Court, certify that the accompanying Reply Brief for Petitioner contains 2,995 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 31, 2023.

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