

No. 23-5310

---

IN THE SUPREME COURT OF THE UNITED STATES

---

JOSEPH FAVORITE, Petitioner,

v.

UNITED STATES OF AMERICA, Respondent,

---

CERTIFICATE OF WORD COUNT

---

The reply brief for petitioner complies with the word limitations of Sup.  
Ct. R. 33. It contains 1866 words.

Dated: November 13, 2023

---

Kenneth P. Tableman  
Kenneth P. Tableman, P.C.  
Attorney for Petitioner  
71 Maryland Avenue, SE  
Grand Rapids, MI 49506-1819  
(616) 233-0455  
[tablemank@sbcglobal.net](mailto:tablemank@sbcglobal.net)