

No. 23-5457

**IN THE
SUPREME COURT OF THE UNITED STATES**

DEANGELUS THOMAS,

PETITIONER,

vs.

UNITED STATES OF AMERICA,

RESPONDENT.

**ON PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI

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ARGUMENT

The government's response indicates that it is in agreement with Mr. Thomas that the circuits' adherence to pre-Wooden precedent on the question presented is incorrect, yet intractably entrenched. Therefore, Mr. Thomas has no further argument. If the Court does grant certiorari review in one of the similar cases mentioned in the government's response, Mr. Thomas respectfully requests that the Court hold his case in abeyance pending the outcome of that case.

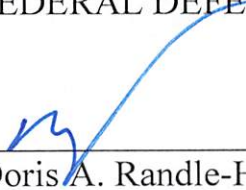
CONCLUSION

For all of the foregoing reasons, Petitioner respectfully continues his prayer that this Court grant certiorari to review the judgment of the Sixth Circuit in his case.

DATED: 20th day of October, 2023.

Respectfully submitted,

DORIS RANDLE HOLT
FEDERAL DEFENDER



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