

No. 23-5567

IN THE
Supreme Court of the United States

CARLOS GILBERT ARELLANO-RAMIREZ,
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 2,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on November 7, 2023.



SETH P. WAXMAN

Counsel of Record

WILMER CUTLER PICKERING

HALE AND DORR LLP

2100 Pennsylvania Ave., NW

Washington, DC 20037

(202) 663-6000

seth.waxman@wilmerhale.com