

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-5572

Joseph W. Fischer,

Petitioner,

v.

United States of America,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Frederick W. Ulrich, certify that the Petitioner's Reply Brief in the foregoing case contains 5,604 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2024.

/s/ Frederick W. Ulrich
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