

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-6496

IRVIN HARRIS JOHNSON,

Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Petitioner's Reply Brief in the foregoing case contains 2,304 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 June 4, 2024.

/s/ Jeffrey T. Green

JEFFREY T. GREEN
NORTHWESTERN SUPREME
COURT PRACTICUM
375 East Chicago Avenue
Chicago, IL 60611
(312) 503-1486