

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 23-

LARRY COATES,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, Esq., certify that the Petition For A Writ Of Certiorari in the foregoing case contains 5,917 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 January 17, 2024.

/s/ Tobias S. Loss-Eaton  
TOBIAS S. LOSS-EATON, ESQ.  
Sidley Austin LLP  
1501 K St NW  
Washington, DC 20005  
(202) 736-8000  
*tlosseaton@sidley.com*