

In the Supreme Court of the United States

No. 23-95

PHILIP ESFORMES,
PETITIONER,

v.

UNITED STATES OF AMERICA,
RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Matthew B. Nicholson, counsel for petitioner Philip Esformes and a member of the Bar of this Court, certify that the Reply Brief for Petitioner in the above-captioned case contains 2,883 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Matthew B. Nicholson

MATTHEW B. NICHOLSON

November 21, 2023