No. 24-395

IN THE

Supreme Court of the United States

WILLIAM EDWARD NEILLY,

Petitioner,

v.

STATE OF MICHIGAN,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Neilly v. Michigan*, No. 24-395, complies with the word limitations, as it contains 2,707 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: February 5, 2025

William D. Coglianese