

**In the Supreme Court of the United States**

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PEOPLE OF THE STATE OF MICHIGAN, PETITIONER

v.

DAVID ALLAN LUCYNSKI

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ON PETITION FOR A WRIT OF CERTIORARI  
TO THE MICHIGAN SUPREME COURT

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**CERTIFICATE OF COMPLIANCE**

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Attorney for Petitioner, People of the State of Michigan, hereby certifies that the foregoing Reply Brief complies with the type-volume limitation of Supreme Court Rule 33.1(g)(iii), in that the word-processing system used to prepare the brief indicates that the brief contains 2,277 words.

Respectfully submitted,

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Dated: February 7, 2025