In the Supreme Court of the United States

RODNEY REED,

Petitioner,

v.

BRYAN GOERTZ, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for the Petitioner in *Rodney Reed v. Bryan Goertz, et al.*, S. Ct. No. 21-442, complies with the word limitations, because it contains 2,998 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: February 1, 2022

Parker Rider-Longmaid