

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-541

TRAVIS TUGGLE, PETITIONER

v.

UNITED STATES OF AMERICA, RESPONDENT

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for petitioner Travis Tuggle and a member of the Bar of this Court, certify that the Reply Brief for Petitioner in the above-captioned case contains 2,972 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt

Lisa S. Blatt

January 26, 2022