

In the Supreme Court of the United States

MARK E. PULSIFER,

Petitioner,

v.

UNITED STATES,


Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Mark Pulsifer v. United States*, S. Ct. No. 22-340, complies with the word limitations, because it contains 1,468 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 2, 2023



Shay Dvoretzky

