

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

MARK E. PULSIFER,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Supplemental Brief for Petitioner in *Mark Pulsifer v. United States*, S. Ct. No. 22-340, complies with the word limitations, because it contains 740 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 22, 2023

  
Shay Dvoretzky

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