

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-6389

JUSTIN RASHAAD BROWN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Reply Brief for Petitioner in the foregoing case contains 954 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on April 12, 2023.

/s/ Jeffrey T. Green
JEFFREY T. GREEN
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
(202) 736-8291