

No. 22-6640
IN THE
Supreme Court of the United States

EUGENE JACKSON,
Petitioner,
v.
UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,864 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 July 19, 2023.

/s/ Douglas E. Litvack
Douglas E. Litvack