

No. 22-77

IN THE
Supreme Court of the United States

DAVID BROWN,

Petitioner,

v.

LOUISIANA,

Respondent.

On Petition for a Writ of Certiorari to the
Supreme Court of Louisiana

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 12th day of October, 2022, that the Reply Brief for Petitioner in the above-captioned case contains 2,626 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher

Jeffrey L. Fisher