

No. 23-370

IN THE
Supreme Court of the United States

PAUL ERLINGER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, hereby certify on this 4th day of March, 2024, that the Reply Brief for Petitioner in the above-captioned case contains 5,229 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher

Jeffrey L. Fisher