

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-5572

JOSEPH W. FISCHER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Frederick W. Ulrich, Esq., certify that the Reply Brief of Petitioner in the foregoing case contains 2,000 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 November 13, 2023.

/s/ Frederick W. Ulrich

FREDERICK W. ULRICH, ESQ.

Assistant Federal Public Defender

Middle District of Pennsylvania

100 Chestnut Street, 3d Floor

Harrisburg, Pennsylvania 17101

(717) 782-2237

fritz_ulrich@fd.org