

**In the Supreme Court of the United States**

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CHRISTOPHER KINZY, PETITIONER

*v.*

UNITED STATES

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Christopher Kinzy v. United States*, S. Ct. No. 23-578, complies with the word limitations, because it contains 3,000 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: April 30, 2024

  
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Shay Dvoretzky

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