IN THE SUPREME COURT OF THE UNITED STATES

No. 24-820

DANIEL RUTHERFORD,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 12,931 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

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

Executed on August 8, 2025.

Justin B. Berg

Justin Berg

Counsel of Record for Petitioner