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June 8, 2026

Clerk
Supreme Court of the United States
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Washington, D.C. 20002

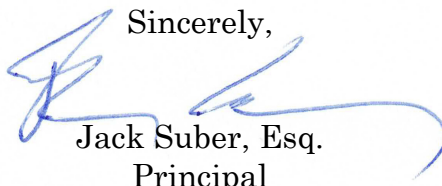
RE 25-1082: JOSEPH SULLIVAN V. UNITED STATES

Dear Sir or Madam:

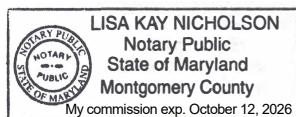
As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner referenced above contains **2,989** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 8th day of June 2026.

