

IN THE
Supreme Court of the United States

OKELLO T. CHATRIE,

Petitioner,

v.

UNITED STATES,

Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ari Holtzblatt, a member of the bar of this Court, certify that the accompanying Brief for Microsoft Corporation as Amicus Curiae in Support of Neither Party contains 6,103 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 9, 2026.

Ari Holtzblatt/PLT

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