

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 25-163

CORRIGAN CLAY,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Reply Brief in the foregoing case contains 2,824 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 October 28, 2025.

/s/ Tobias S. Loss-Eaton  
TOBIAS S. LOSS-EATON  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8427  
tlosseaton@sidley.com