## In the Supreme Court of the United States

No. 25-246

KENNETH JOHN JOUPPI, PETITIONER

v.

STATE OF ALASKA

## CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel B. Gedge, a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 3,000 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: November 24, 2025.

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