

No. 25-331

IN THE
Supreme Court of the United States

PATRICK WAYMAN SCULLARK, JR.,

Petitioner,

v.

STATE OF IOWA,

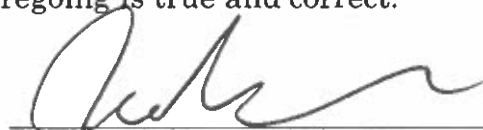
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Scullark v. Iowa*, No. 25-331, complies with the word limitations, as it contains 2,986 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: November 18, 2025



Jeffrey R. Johnson