

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-407

SCOTT BREIMEISTER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Josh Barrett Schaffer, certify that the Petitioner's Reply Brief in the foregoing case contains 2,016 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 March 24, 2026.

/s/ Josh Barrett Schaffer
JOSH BARRETT SCHAFFER
SCHAFFER LAW OFFICES
1021 Main Street
Suite 1440
Houston, TX 77002
(713) 951-9555