#### IN THE

## SUPREME COURT OF THE UNITED STATES

## PHILLIP R. DURACHINSKY, Petitioner

VS.

# UNITED STATES OF AMERICA, Respondent

### CERTIFICATION OF COUNSEL

Pursuant to Supreme Court Rule 33.1(h), counsel states that the Petition for Certiorari filed in this matter was prepared in Microsoft Word 365, using Century 12 point font, and contains 3456 words.

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### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was sent this 30<sup>th</sup> day of June, 2025, by U.S. mail as well as through electronic filing to the office of the Solicitor General.

Kevin M. Schad Attorney for Petitioner