

No. 25-529

In the Supreme Court of the United States

MIKE BROWN, WARDEN PETITIONER

v.

LOUIS CHANDLER

**ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

CERTIFICATE OF COMPLIANCE

Attorney for Petitioner Mike Brown, hereby certifies that the foregoing Reply Brief complies with the type-volume limitation of Supreme Court Rule 33.1(g)(iii), in that the word-processing system used to prepare the brief indicates that the brief contains 3,000 words.

Respectfully submitted,

Dana Nessel
Michigan Attorney General

Ann M. Sherman

Ann M. Sherman
Solicitor General
Counsel of Record
P.O. Box 30212
Lansing, Michigan 48909
ShermanA@michigan.gov
(517) 335-7628

Jared Schultz
Assistant Attorney General
Criminal Appellate and
Parole Appeals Division
Michigan Department of Attorney General
Attorneys for Petitioner

Dated: February 17, 2026