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April 20, 2026

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

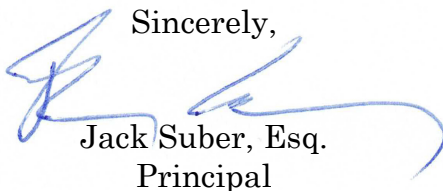
RE 25-576: STEPHEN BUYER V. UNITED STATES

Dear Sir or Madam:

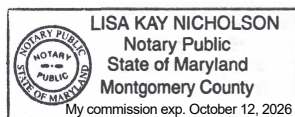
As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner referenced above contains **2,617** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 20th day of April 2026.



Lisa Kay Nicholson