

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-6911

GREGORY PHEASANT,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Ellese Henderson, certify that the Reply Brief for Petitioner in the foregoing case contains 2,741 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 June 9, 2026.

/s/ Ellese Henderson

ELLESSE HENDERSON

ASSISTANT FEDERAL PUBLIC DEFENDER

OFFICE OF THE FEDERAL PUBLIC DEFENDER

411 E. Bonneville Ave., Ste 250

Las Vegas, NV 89101

(702) 388-5141

ellesse_henderson@fd.org