

In the Supreme Court of the United States

ASHLEY GRAYSON, PETITIONER

v.

UNITED STATES

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply Brief for Petitioner in *Grayson v. United States*, S. Ct. No. 25-851, complies with the word limitations, because it contains 1,317 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: May 15, 2026



Shay Dvoretzky

