In the Supreme Court of the United States

NO. 26-137

MICHAEL J. MADIGAN,
PETITIONER,

V.

UNITED STATES OF AMERICA,
RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for petitioner Michael J. Madigan and a member of the Bar of this Court, certify that the Reply Brief of Petitioner in the above-captioned case contains 3,000 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ *Lisa S. Blatt*
LISA S. BLATT

NOVEMBER 16, 2026