

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2025

CASE NO. _____

PHILLIP TIMOTHY HOWARD,
Petitioner,

vs.

CERTIFICATE OF WORD COUNT

THE UNITED STATES OF AMERICA,
Respondent

_____ /

Undersigned CJA appellate counsel for PHILLIP TIMOTHY HOWARD, hereby certifies that the relevant portions of the Petition for Writ of Certiorari contain no more than 7,350 words.

Respectfully submitted,

/s/ Sheryl J. Lowenthal

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Dated: May 29, 2026

Revised July 6, 2026

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