In the Supreme Court of the United States

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THOMAS PERTTU, PETITIONER

v.

KYLE BRANDON RICHARDS

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

CERTIFICATE OF COMPLIANCE

Attorney for Petitioner Thomas Perttu, hereby certifies that the foregoing Reply Brief complies with the type-volume limitation of Supreme Court Rule 33.1(g)(iii), in that the word-processing system used to prepare the brief indicates that the brief contains 2,198 words.

Respectfully submitted,

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