No. 23-652

In the Supreme Court of the United States

CHADWICK DOTSON,

Petitioner,

v.

BERMAN JUSTUS, JR.,

Respondent.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Andrew N. Ferguson, a member of the bar of this Court, certify that the accompanying Reply Brief of the Petitioner contains 2,958 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 4, 2024.

/s/ Andrew N. Ferguson

ANDREW N. FERGUSON SOLICITOR GENERAL VIRGINIA OFFICE OF THE ATTORNEY GENERAL 202 North Ninth Street Richmond, Virginia 23219 (804) 786-7704 AFerguson@oag.state.va.us SolicitorGeneral@oag.state.va.us