No. 23-825

IN THE

Supreme Court of the United States

SALVATORE DELLIGATTI,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required Rule 33.1(h) of the Rules of this Court, I hereby certify that I am a member in good standing of the bar of this Court and that the *Brief Of National Association For Public Defense As* Amicus Curiae *In Support Of Petitioner* contains 2,840 words and complies with the word limitation established by Rule 33.1(g)(xii) of the Rules of this Court, excluding the parts of the document that are exempted by Rule 33.1(d).

August 15, 2024

Daniel Woofter