## In The Supreme Court of the United States

No
JEREMY HENNING,
Petitioner,
v.
Donald Snowden,
Respondent.

## **CERTIFICATE OF COMPLIANCE**

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari contains 8,974 words, excluding parts of the document that are exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2024.

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