

IN THE  
**Supreme Court of the United States**

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No. 23-976

JEREMY HENNING,  
*Petitioner,*

v.

DONALD V. SNOWDEN,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Reply for Petitioner contains 2,994 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 July 2, 2024.



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