RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 24-320

SIMON A. SOTO,

Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I, J. Simone Jones, certify that the Petitioner's Reply Brief in the foregoing case contains 2,984 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 3, 2024.

/s/ J. Simone Jones
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