

CERTIFICATE OF COMPLIANCE

No. 17-155

Erik Lindsey Hughes,

Petitioner,

v.

United States,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Law Professors as *Amici Curiae* in Support of Neither Party contains 9,000 words, excluding the parts 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 January 26, 2018.



Maxwell L. Stearns
Counsel for Amici Curiae