In the Supreme Court of the United States

BRANDEN HUERTAS,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF WORD COUNT

I, Michael B. Kimberly, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief contains 6,972 words, excluding the parts of the brief exempted by Rule 33.1(d).

Michael B. Kimberly