

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

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PHILLIP A. MEARING,  
*Petitioner,*  
*v.*

UNITED STATES OF AMERICA,  
*Respondent.*

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Christopher E. Babbitt, a member of the bar of this Court, certify that the accompanying Brief for The National Association of Criminal Defense Lawyers as Amicus Curiae in Support of Petitioner contains 3,797 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 5, 2018.



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