No. 18-370

IN THE

Supreme Court of the United States

MARLON HAIGHT,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,000 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 18, 2018.

Ishan K. Bhabha