

No. _____

In the Supreme Court of the United States

BARRY MICHAELS,

Petitioner,

v.

JEFFERSON B. SESSIONS III, ATTORNEY
GENERAL OF THE UNITED STATES, and
THOMAS E. BRANDON, as DEPUTY DIRECTOR,
HEAD OF THE BUREAU OF ALCOHOL,
TOBACCO, FIREARMS AND EXPLOSIVES,

Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Petition for Writ of Certiorari of Petitioner Barry Michaels contains 4,749 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

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

Executed this 24th day of August 2018.

/s/ Michael E. Zapin

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