

No. \_\_\_\_\_

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In The  
SUPREME COURT OF THE UNITED STATES

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ERIC D. GATHINGS,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent.*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Eighth Circuit

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8924 words—measured using Microsoft Word 365—excluding the parts of the petition 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 October 14, 2018.

s/John William Simon

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