

No. _____

In The
SUPREME COURT OF THE UNITED STATES

ERIC D. GATHINGS,

Petitioner,

v.

UNITED STATES,

Respondent.

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

CERTIFICATE OF COMPLIANCE

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
JOHN WILLIAM SIMON*

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