

IN THE SUPREME COURT OF THE UNITED STATES

2018 TERM

NO. _____

MICHAEL LOUGH, Petitioner

v.

UNITED STATES OF AMERICA, Respondent.

WORD COUNT CERTIFICATION

As required by Supreme Court Rule 33.1(h), I, Kristen M. Leddy, certify that the document contains 3321 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 August 2, 2018.

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