

No. 18-759

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IN THE  
*Supreme Court of the United States*

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MATTHEW D. SAMPLE,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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CERTIFICATE OF WORD COUNT

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As required by Supreme Court Rule 33.1(h), I certify that the *amicus curiae* brief contains 2,849 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I further certify that pursuant to Supreme Court Rule 37.5, the motion contains 351 words.

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

Executed on January 14, 2019.

  
Clifford W. Berlow