No. 18-7739

IN THE Supreme Court of the United States

GONZALO HOLGUIN-HERNANDEZ,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Philip J. Lynch, a member of the bar of this Court, certify on this 27th day of September 2019, that the Corrected Brief for Petitioner in the above-captioned case contains 6,208 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

> <u>/s/ Philip J. Lynch</u> Philip J. Lynch