

No.18-

In the
SUPREME COURT OF THE UNITED STATES

In Re Chien

&

Andrew Chien

Petitioner,

v.

Commonwealth of Virginia et al.

Respondents

Certificate of Compliance

As required by Supreme Court Rule 33.1(h), I certify that the Brief for petitioner Andrew Chien Complies with the word limitation as it contains 8,996 words.

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

Date: December 14, 2018

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