
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 Petitioner's Supplemental Brief (I) complies with the word limitation as it contains 2,997 words.

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

Date: January 29, 2019 *Andrew Chien*

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