

No.18 - 775

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In the  
**SUPREME COURT OF THE UNITED STATES**

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In Re Chien

&

Andrew Chien

Petitioner,

v.

Commonwealth of Virginia et al.

Respondents

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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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