

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 (II) complies with the word limitation as it contains 663 words.

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

Date: February 8, 2019

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