

No.18 - 775

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 (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

Andrew Chien

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