### No. 19-1070

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# In the Supreme Court of the United States

## JEFFREY ALAN OLSON,

Petitioner

v.

# PENNSYLVANIA,

Respondent

On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania

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### CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Respondent's Brief in Opposition was prepared using Century Schoolbook 12-point typeface (10 point for footnotes) and contains 2,804 words, excluding those parts exempted by Rule 33.1(d). This certificate was prepared in reliance on the word count function of the word processing system used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 1, 2020.

Respectfully submitted,

/s/

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