IN THE

Supreme Court of the United States

UNITED STATES, Petitioner,

v

MICHAEL J.D. BRIGGS, Respondent.

UNITED STATES, Petitioner,

v.

RICHARD D. COLLINS, Respondent.

United States, Petitioner,

v.

HUMPHREY DANIELS III, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the U.S. Army Defense Appellate Division's Brief for Amicus Curiae complies with the word limitations and contains 7,330 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on this 19th day of February, 2020.

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