

**CERTIFICATE OF COMPLIANCE**

No. 19-\_\_\_\_\_

FRANK J. LAWRENCE, JR.,

Petitioner,

v.

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN,  
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 3,630 words, excluding the parts of the Petition 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 July 19, 2019

/s/ Dennis Dubuc  
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