IN THE

Supreme Court of the United States

JEFFREY A. ROSEN, ACTING ATTORNEY GENERAL, *Petitioner*,

v.

MING DAI,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 4th day of January, 2021, that the Brief for the Respondent contains 12,949 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

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