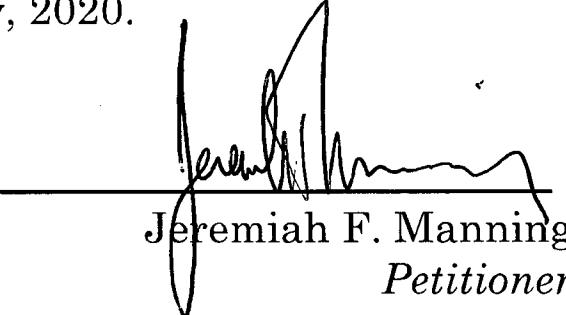


## CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) and (g)(iv) of the Rules of the Supreme Court of the United States, I hereby certify that the accompanying Supplemental Brief on behalf of Petitioner Jeremiah F. Manning, which was prepared using Century Schoolbook 12-point typeface, contains 2,834 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing program (Microsoft Word) used to prepare this document.

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

DATED this 15th Day of May, 2020.

  
\_\_\_\_\_  
Jeremiah F. Manning  
*Petitioner*