

No. .....

IN THE SUPREME COURT OF THE UNITED STATES

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Robert Marcelis,  
petitioner,

v.

Commonwealth of Pennsylvania,  
respondent.

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CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I certify that I am a member of the bar of this court and that the June 26, 2020, petition for *certiorari* complied with the 9,000 word limit for such petitions. The word count, according to the WordPerfect word processing system, is 3,244, including footnotes.

/s/ *Richard T. Brown, Jr.*