## IN THE Supreme Court of the United States

No. 19-5410

CHARLES BORDEN, JR., Petitioner, v. UNITED STATES OF AMERICA, Respondent.

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

## **CERTIFICATE OF COMPLIANCE**

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief of Law Professors Leah Litman *et al.* as *Amici Curiae* in Support of Petitioner contains 7,935 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on May 4, 2020.

Jara May

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