

IN THE SUPREME COURT OF THE UNITED STATES

No. 19-618

JON ERIC SHAFFER,
Petitioner

v.

COMMONWEALTH OF PENNSYLVANIA,
Respondent

On Petition for a Writ of Certiorari to
the Court of Pennsylvania

Brief in Opposition; Certificate of Word Count

Undersigned completed a Certificate of Word Count on or about March 12, 2020. According to undersigned's assistant, the Certificate of Word Count was sent to this Court with Respondent's Brief in Opposition. Based on communication from the Clerk's Office of this Court, this Court has not received or has not located the aforementioned Certificate of Word Count. Due to the coronavirus and undersigned's office closing, undersigned cannot access the original Certificate of Word Count. Based on undersigned's memory, his assistant's memory, and undersigned's review of a prior draft of the Brief in Opposition, undersigned can certify pursuant to Supreme Court Rule 33.1(h) that to the best of undersigned's understanding the Brief in Opposition contains no more than 4,999 words. Opposing counsel, Amir H. Ali, Esq., does not oppose this Certificate. Please accept this Certificate due to the extreme circumstances surrounding the coronavirus.

Respectfully submitted,

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Commonwealth of Pennsylvania

/s/ Christopher J. Schmidt
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Date: March 17, 2020