

**In the Supreme Court of the United States**

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No. \_\_\_\_\_

MICHAEL HERROLD,  
*Petitioner,*  
*v.*

UNITED STATES OF AMERICA.

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*ON PETITION FOR A WRIT OF CERTIORARI TO  
THE UNITED STATES COURT OF APPEALS FOR  
THE FIFTH CIRCUIT*

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**CERTIFICATE OF WORD COUNT**

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As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,867 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 18, 2020.

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