## In the Supreme Court of the United States

NATHAN VAN BUREN,

Petitioner,

v.

UNITED STATES OF AMERICA, Respondent.

## CERTIFICATE OF COMPLIANCE

I certify that the document, BRIEF OF KAREN HEART AND ANTHONY VOLINI OF CIPLIT AS AMICI CURIAE IN SUPPORT OF RESPONDENT, filed in the above-styled cause, contains 4,460 words, which complies with the word limitations set out in the Rules of this Court.

Date: Sep. 2, 2020

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Counsel of Record

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