

## CERTIFICATE OF COMPLIANCE

No. 19-783

NATHAN VAN BUREN,

Petitioner,

 $\mathbf{v}$ .

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Digital Justice Foundation in Support of Affirmance contains 4,950 words, excluding the parts of the Brief 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 September 3, 2020.

Donna J. Wolf

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date:

Notary Public

[seal]

