

Case No. _____

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2019

MICHAEL MUNDAY,

Petitioner,

vs.

CERTIFICATE OF
WORD COUNT

THE UNITED STATES OF AMERICA,

Respondent

_____ /

Undersigned CJA Appellate Counsel for Petitioner Michael Munday, submits this Certificate of Word Count, and certifies that the Petition is prepared on Microsoft 365 - Word for Windows in Times New Roman 14 point font; and that it contains no more than 5,300 words.

Respectfully submitted,

/s/ Sheryl J. Lowenthal

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