

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

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IN THE SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 2020

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CARL BURDICK,  
*Petitioner*

v.

UNITED STATES OF AMERICA,  
*Respondent*

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CERTIFICATE OF WORD COUNT

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I certify that the petition for a writ of certiorari filed on May 20, 2020, complies with the requirements of Rule 33(2)(b) and 33(1)(g)(i) of the Rules of the Supreme Court. The petition consists of 27 pages and 5,067 words, not counting those portions of the petition excluded in Rule 33(1)(d).

Dated: Buffalo, New York  
May 20, 2020

Respectfully submitted,

/s/Martin J. Vogelbaum

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