

No. 20 - _____

IN THE SUPREME COURT OF THE UNITED STATES

October Term, 2020

FATOU SMALL,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT AND PAGE COUNT

I, John S. Malik, counsel for Petitioner Fatou Small, do hereby certify on this date, June 4, 2020, that Petitioner Fatou Small's Petition for Writ of Certiorari contains 8,194 words as calculated by the Microsoft Word® for Mac® 2011, Version 14.5.3, word-processing program used to create it and thereby is in compliance with Rule 33.1(h) in that it contains less than 9,000 words and with Rule 33.2(b) in that it is less than 40 pages in length.

Respectfully submitted,

/s/ John S. Malik

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