

No. _____

In the Supreme Court of the United States

MICHAEL D. NIXON,
Petitioner,

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,812 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

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