

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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JONATHAN BOYER, *Petitioner*,  
*v.*  
DARREL VANNOY, WARDEN, LOUISIANA STATE PENITENTIARY,  
*Respondent.*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 4,765 words, excluding the parts of the petition 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 June 29, 2020.

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**RICHARD BOURKE**, *Counsel of Record*  
Attorney for Petitioner

Dated: June 29, 2020