

NO. \_\_\_\_\_

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In the  
Supreme Court of the United States

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BAHAR MIKHAK,  
*Petitioner,*

v.

UNIVERSITY OF PHOENIX (UOP),  
*Respondent.*

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On Petition for Writ of Certiorari to the  
United States Court of Appeals for the Ninth Circuit

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h),  
I certify that Bahar Mikhak's PETITION FOR WRIT  
OF CERTIORARI contains 8979 words, including  
the parts of the Brief that are required or 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.

Executed on January 25, 2020.

A handwritten signature in black ink, appearing to read 'Bahar Mikhak', is written over a horizontal line.

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