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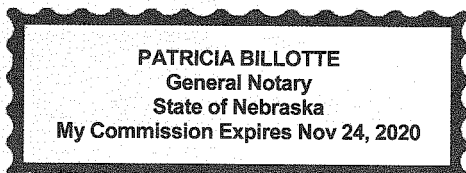
No. _____

JOHN M. MARSHALL, et al., TRANSFEREES,
Petitioners,
v.
COMMISSIONER OF INTERNAL REVENUE,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR A WRIT OF CERTIORARI in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 7960 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 30th day of January, 2020.
I am duly authorized under the laws of the State of Nebraska to administer oaths.



Patricia C. Billotte

Notary Public

Andrew H. Cockle

Affiant