

SUPREME COURT OF THE UNITED STATES

No. 20-1129

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SCOTT PHILLIP FLYNN,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5975 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.

Executed on this 19<sup>th</sup> day of March, 2021.



\_\_\_\_\_  
Melissa Pickett

Sworn to and subscribed before me this 19<sup>th</sup> day of March, 2021.



**MARIA MAISONET**  
Notary Public State of New York  
No. 01MA6204360  
Qualified in Queens County  
Commission Expires Apr. 20, 2021