

No. 20-1369

---

***IN THE SUPREME COURT OF THE UNITED STATES***

---

**MOHAMMED JABATEH**, Petitioner,

v.

**UNITED STATES**, Respondent.

-----  
On Petition for Writ of Certiorari to the  
To the United States Court of Appeals for the Third Circuit  
-----

**CERTIFICATE OF COMPLIANCE**

I am a member of the Bar of this Court, appearing as counsel of record for the petitioners. As required by this Court's Rule 33.1(h), I certify, based on the word-counting function of my word-processing software (set to include footnotes), that the petitioner's Reply to the Brief in Opposition to the petition for writ of certiorari contains fewer than 3000 words (the maximum allowed by Rule 33.1(g)(iii)), that is, no more than 2984 words, excluding any parts that are exempted by Rule 33.1(d).

Date: July 15, 2021

A handwritten signature in black ink, appearing to read "Peter Goldberger", written over a horizontal line.

PETER GOLDBERGER  
50 Rittenhouse Place  
Ardmore, PA 19003-2276  
(610) 649-8200  
peter.goldberger@verizon.net  
Counsel for Petitioner