SUPREME COURT OF THE UNITED STATES

No. 20-1388

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ALICE PERKINS, FREDRICK PERKINS,

Petitioners,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,975 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 9th day of September 2021.

Noel Reyes

Sworn to and subscribed before me this 9th day of September 2021.

Mariana Braylovsb

Mariana Braylovskiy Notary Public State of New York No. 01BR6004935 Qualified in Richmond County Commission Expires March 30, 2022