In the Supreme Court of the United States

DR. XIULU RUAN,

Petitioner.

v.

UNITED STATES OF AMERICA.

Respondent.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For The Eleventh Circuit

CERTIFICATE OF COMPLIANCE

As required by Rule 33.1(h), I, D. Hunter Smith, a member of the Bar of this Court, hereby certify that the Petition for a Writ of Certiorari in the abovecaptioned case contains 8,999 words, excluding the parts of the brief that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the wordcount function of the word-processing system (Microsoft Word for Office 365) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

D. Hunter Smith

April 5, 2021