

No. 20-1410

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 Reply Brief for Petitioner in the above-captioned case contains 2,883 words, excluding the parts of the brief that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count 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

July 20, 2021