

Nos. 20-1410 & 21-5261

In the Supreme Court of the United States

XIULU RUAN,

Petitioner,

v.

UNITED STATES,

Respondent.

SHAKEEL KAHN,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF WORD COUNT

I, H. Christopher Bartolomucci, a member of the Bar of this Court, hereby certify under Supreme Court Rule 33.1(h) that the Brief for *Amicus Curiae* complies with the word limitations in Supreme Court Rule 33.1(g). I further certify that the brief contains 6,654 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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