

IN THE  
**Supreme Court of the United States**

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XIULU RUAN,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

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SHAKEEL KHAN,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

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**On Writs of Certiorari to the  
United States Courts of Appeals  
for the Tenth and Eleventh Circuits**

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**BRIEF OF AMICUS CURIAE THE NATIONAL  
ASSOCIATION OF CRIMINAL DEFENSE  
LAWYERS IN SUPPORT OF PETITIONERS**

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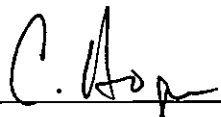
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,376 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.

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Executed on December 27, 2021.



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