

No. \_\_\_\_\_

MICHAEL HARRISON LOWMAN, JR.,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

I, Anthony G. Lantagne, hereby certify that the above referenced Petition for Writ of Certiorari, as indicated by the word count feature of MS Word and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 2,246 words.

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

Executed on this 6<sup>th</sup> day of April, 2020.



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COMMONWEALTH OF VIRGINIA     )  
CITY OF RICHMOND                )     to-wit:

Anthony G. Lantagne appeared before me this 6<sup>th</sup> day of April, 2020 and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.



Richard Markell