

No. \_\_\_\_

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**In the Supreme Court of the United States**

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ALAN CRITTENDEN,

*Petitioner,*

v.

MARIKO CRITTENDEN,

*Respondent.*

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CERTIFICATE OF WORD COUNT  
OF  
PETITION FOR WRIT OF CERTIORARI

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**CERTIFICATE OF WORD COUNT OF  
PETITION FOR WRIT OF CERTIORARI**

As required by Supreme Court Rule 33.1(h), and Orders of this Court dated April 15, 2020, I declare that the Petition for Writ of Certiorari to the Georgia Supreme Court being filed herewith is 8,067 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Respectfully submitted,

  
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Dated: April 15, 2021