

No. 20-

IN THE SUPREME COURT OF THE UNITED STATES

DEVON E. SANDERS, Petitioner,

v.

UNITED STATES, Respondent.

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, appearing as counsel of record for the petitioners. As required by this Court's Rule 33.1(h), I certify, based on the word-counting function of my word-processing software (set to include footnotes), that the petition for certiorari contains fewer than 9000 words (the maximum allowed by Rule 33.1(g)(i)), that is, no more than 5731 words, excluding the parts of the petition that are exempted by Rule 33.1(d).

Date: May 10, 2021



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