

CERTIFICATE OF COMPLIANCE

No. 20-1595

NAUM MORGOVSKY AND IRINA MORGOVSKY,
Petitioners,
v.
UNITED STATES OF AMERICA,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners contains 2,915 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on August 4, 2021.



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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: August 4, 2021
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023