

IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1607

MICHIGAN, PETITIONER

v.

ANTHONY MICHAEL OWEN, RESPONDENT

CERTIFICATE OF WORD COUNT

I, Lisa Blatt, counsel for respondent and a member of the Bar of this Court, certify that the brief in opposition in the above-captioned case contains 4534 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt

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