## In The Supreme Court Of The United States

MARION E. PITCH, THE PERSONAL REPRESENTATIVE OF THE ESTATE OF ANTHONY S. PITCH, AND LAURA WEXLER,

PETITIONERS,

RESPONDENT.

V.

UNITED STATES OF AMERICA,

CERTIFICATE OF WORD COUNT.

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Amicus Brief In Support Of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 3,822 words excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I am a member of the Bar of the Supreme Court of the United States.

DATED this 14th day of October 2020.

William M. Simpich

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