In the Supreme Court of the United States

UNITED STATES OF AMERICA, PETITIONER,

7)

José Luis Vaello-Madero

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS FOR BRIEF OF THE AMERICAN BAR ASSOCIATION AS AMICUS CURIAE IN SUPPORT OF RESPONDENT

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CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

As required by Supreme Court Rule 33.1(h), I certify that the Brief Of The American Bar Association As *Amicus Curiae* In Support Of Respondent contains 7,853 words, excluding the parts of the document 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 September 3, 2021

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