

No. 20-347  
IN THE  
**Supreme Court of the United States**

CHARLES MALCOLM SPIVEY, JR.  
*Petitioner,*  
v.

UNITED STATES OF AMERICA,  
*Respondent.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,657 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 November 20, 2020.

/s/ Eric J. Brignac  
Eric J. Brignac