

No. \_\_\_\_\_

JOSHUA E. FRANKEL,  
*Petitioner,*

vs.

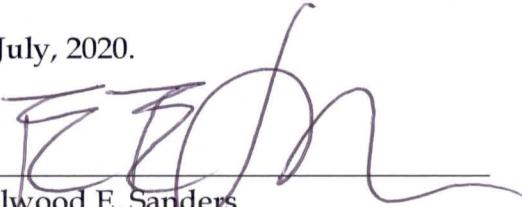
UNITED STATES OF AMERICA, ET AL.,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

I, Elwood E. Sanders, hereby certify that the above referenced Petition for Writ of Certiorari, as indicated by the word count feature of MS Word and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 6,756 words.

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

Executed on this 13<sup>th</sup> day of July, 2020.

  
Elwood E. Sanders  
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801 E. Main Street, Suite 100  
Richmond, Virginia 23219  
(804) 644-0477

COMMONWEALTH OF VIRGINIA )  
CITY OF RICHMOND ) to-wit:

Elwood E. Sanders appeared before me this 13<sup>th</sup> day of July, 2020, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.



  
Richard Markell