

No. _____

IN THE

Supreme Court of the United States

MARK STANFORD KATZMAN,

Petitioner;

v.

THE PEOPLE OF THE STATE OF MICHIGAN,

Respondent

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that this petition for a writ of certiorari contains 3996 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

 9/25/2020

Noel Erinjeri date

Counsel of Record