

No. 20-437

IN THE
Supreme Court of the United States

UNITED STATES,

Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,

Respondent.

On Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit

CERTIFICATE PURSUANT TO RULE 33

Pursuant to Rule 33.2, I hereby certify that this brief contains approximately 6,029 words. This brief was prepared in 12-point Century Schoolbook font.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: March 29, 2021



By: _____
BRIANNA FULLER MIRCHEFF*
Deputy Federal Public Defender
Attorneys for Amicus Curiae
**Counsel of Record*