

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

DZHOKHAR A. TSARNAEV,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the Supreme Court Bar and, as required by Supreme Court Rules 33.1(h) and 33.1(g)(ii), the Brief in Opposition contains 8,951 words, excluding the parts of the petition that are exempted by Supreme Court Rule.

Dated: December 17, 2020

Respectfully submitted,



Arn Jacobsen