

No. 20-444
IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,
Petitioner,

v.

MICHAEL ANDREW GARY,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,752 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 March 25, 2021.

/s/ David Bitkower
David Bitkower