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March 25, 2021

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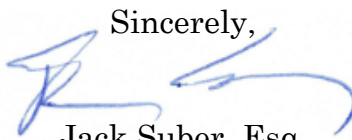
**RE 20-444: UNITED STATES OF AMERICA V. MICHAEL ANDREW GARY**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Former United States District Court Judges referenced above contains **6,658** 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.

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 25th day of March 2021.

