

No._____

IN THE
Supreme Court of the United States

MICHAEL ELDER,
Petitioner,
v.

THE UNITED STATES OF AMERICA,
Respondent.

WORD COUNT CERTIFICATION

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 6,913 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 5, 2020.

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