

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.

DWAYNE D. SAM*
WOMBLE BOND
DICKINSON (US) LLP
1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036
Telephone: 202-857-4445
dwayne.sam@wbd-us.com

**Counsel of Record*