

SUPREME COURT OF THE UNITED STATES

No. 20-456

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MICHAEL ELDER,

*Petitioner,*

v.

THE UNITED STATES OF AMERICA,

*Respondent.*

-----X

**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h),  
I certify that the corrected document contains 2,985  
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 December 22, 2020.



\_\_\_\_\_  
Noel Reyes

Sworn to and subscribed before me  
this 22<sup>nd</sup> day of December, 2020.



\_\_\_\_\_  
**MARIA MAISONET**

Notary Public State of New York

No. 01MA6204360

Qualified in Queens County

Commission Expires Apr. 20, 2021

#300813