

SUPREME COURT OF THE UNITED STATES

No. 20-456

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MICHAEL ELDER,

Petitioner,

v.

THE UNITED STATES OF AMERICA,

Respondent.

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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 22nd day of December, 2020.



MARIA MAISONET

Notary Public State of New York
No. 01MA6204360
Qualified in Queens County
Commission Expires Apr. 20, 2021

#300813