

CERTIFICATE OF WORD COUNT

No. 20-458

Michael B. Brown,

Petitioner,

v.

U.S. Department of Labor,

Respondent.

STATE OF MASSACHUSETTS)
COUNTY OF NORFOLK) SS.:

Being duly sworn, I depose and say:

1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.
2. That, as required by Supreme Court Rule 33.1(h), I certify that the MICHAEL B. BROWN PETITION FOR REHEARING contains 2961 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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



Lucas DeDeus

January 8, 2021

SCP Tracking: Brown-P.O. Box 3343-Cover Tan