

CERTIFICATE OF WORD COUNT

Case No. _____

Case Name: *Jan Rouven Fuechtener v. United States*

Document Title: Petition for a Writ of Certiorari

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Petition for a Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 830 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

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

DATED this 13th day of October 2020.

/s/Brandon Sample

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