

No. \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES

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TONY LAM,  
*Petitioner,*  
v.

UNITED STATES OF AMERICA,  
*Respondent.*

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On Petition for Writ of Certiorari  
to the United States Court of Appeals for the Fifth Circuit

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**CERTIFICATE OF WORD COUNT**

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NOW COMES Assistant Federal Public Defender Samantha J. Kuhn, court-appointed counsel for Petitioner Tony Lam, and certifies as follows: As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,999 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.

Respectfully submitted this 31st day of July, 2020.

/s/ Samantha Kuhn  
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