

IN THE
Supreme Court of the United States

DREW SAMUEL BATES,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the **SUPPLEMENTAL BRIEF FOR PETITIONER** in case contains 321 words, excluding 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 the 18th day of February 2021.



DAVID A. O'NEIL
801 PENNSYLVANIA AVE, SUITE 500
WASHINGTON, D.C. 20004
(202) 383-8000
