

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 33.1(h) of the Rules of the Supreme Court of the United States, I hereby certify, on this 3rd day of August, 2020, that the foregoing brief complies with the word limitations as set forth in Rule 33.1(g) of the Rules of the Supreme Court of the United States. This certification is made in reliance on the word count of Microsoft Word, the word-processing system used in preparation of the foregoing, which indicates a 7,908 word count, including footnotes.

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