

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

KEITH A. JAMES,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF WORD COUNT

NOW COMES Assistant Federal Public Defender Samantha J. Kuhn, court-appointed counsel for Petitioner Keith James, and certifies as follows: As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,287 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 7th day of October, 2020.

/s/ Samantha Kuhn
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