

No. 21-

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In The

**SUPREME COURT of the UNITED STATES**

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**Robert A. Heghmann,**

*Petitioner,*

v.

**Donald J. Trump and Wilbur Ross,**

*Respondents.*

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**ON PETITION FOR A WRIT OF MANDAMUS TO THE  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

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**CERTIFICATE OF COMPLIANCE**

Robert A. Heghmann

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The Petitioner certifies that the Petition for a Writ of Mandamus contains 1501 words which is well within the length permissible under Rule 33. Further, while this Petition under Rule 20 would ordinarily be filed in Pamphlet form under Rule 33, due to the current Covid-19 Pandemic this Court has suspended that Rule and now permits filing in the 8 ½ x 11 inch format adopted by the Petitioner in this Petition.

A handwritten signature in black ink, appearing to read "R. W. H." or a similar variation, is written over a horizontal line.