

IN THE  
**Supreme Court of the United States**

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DARRIN B. WOODARD,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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**On Petition for a Writ of Certiorari  
to the United States Court of Appeals for the  
Tenth Circuit**

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 21st day of December 2020, that the Brief of the Due Process Institute as *Amicus Curiae* in Support of Petitioner in the above-captioned case contains 4,919 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Michael R. Dreeben*  
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Michael R. Dreeben