

No. \_\_\_\_\_

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**In the  
Supreme Court of the United States**  
October Term, 2020

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JOSE ANTONIO LUGO-GUERRERO,  
Petitioner

v.

UNITED STATES OF AMERICA,  
Respondent

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***CERTIFICATE OF WORD COUNT***

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As required by Supreme Court Rule 33.1(h), I hereby certify that the document contains 5,003 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2020.

/s/Karen A. Pickett

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Karen A. Pickett