

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

---

IN THE SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 2020

---

QUINCEY FRYE,  
*Petitioner*

v.

UNITED STATES OF AMERICA,

*Respondent*

---

CERTIFICATE OF WORD COUNT

---

I certify that the petition for a writ of certiorari filed on December 3, 2020, complies with the requirements of Rule 33(2)(b) and 33(1)(g)(i) of the Rules of the Supreme Court. The petition consists of 14 pages and 2,648 words, not counting those portions of the petition excluded in Rule 33(1)(d).

Dated: Buffalo, New York  
December 3, 2020

Respectfully submitted,

/s/Martin J. Vogelbaum  
Martin J. Vogelbaum  
Assistant Federal Public Defender  
*Counsel of Record*  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
Buffalo, New York 14202  
Telephone: (716) 551-3341  
E-Mail: martin\_vogelbaum@fd.org