

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

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