

No. 20-

In The
SUPREME COURT OF THE UNITED STATES
October Term 2020

Ihab Masalmani,
Petitioner,

v.

State of Michigan,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,141 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 10, 2020

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