

No. 20-  
In The  
SUPREME COURT OF THE UNITED STATES  
October Term 2020

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Ihab Masalmani,  
*Petitioner,*

v.

State of Michigan,  
*Respondent.*

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**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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