
NO. _____

IN THE UNITED STATES SUPREME COURT

DAVID EARL BROWN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies the Petition for Writ of Certiorari complies with the requirements of the type-volume limitation of Rule 33.1(g)(i), Supreme Court Rules, as it contains 6,399 words excluding the table of contents and the table of citations. Certification is based on the word count of the word-processing system used in preparing the Petition, Microsoft Word 2016.

This the 11th day of December, 2020.

/s/ Erin Rust

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