

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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RICHARD ANDERSON,  
*Petitioner*

v.

UNITED STATES OF AMERICA,  
*Respondent*

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CERTIFICATE OF WORD COUNT

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I certify that the petition for a writ of certiorari filed on December 28, 2020, complies with the requirements of Rule 33(1)(g)(i) and 33(2)(b) of the Rules of the Supreme Court. The petition consists of 29 pages and 4,341 words, not counting those portions of the petition excluded in Rule 34.

Dated: Rochester, New York  
December 28, 2020

Respectfully submitted,

Marianne Mariano  
Federal Public Defender, W.D.N.Y.

/s/Jay Ovsiovitch  
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