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**NO. 20-6794**

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**IN THE UNITED STATES SUPREME COURT**

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**OSCAR GUEVARA SALAMANCA,**

**Petitioner,**

**v.**

**UNITED STATES OF AMERICA,**

**Respondent.**

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**CERTIFICATE OF COMPLIANCE**

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The undersigned hereby certifies the Reply Brief of Petitioner complies with the requirements of the type-volume limitation of Rule 33.1(g)(iii), Supreme Court Rules, as it contains 2,980 words excluding the table of contents, the table of citations, and counsel's signature block. Certification is based on the word count tool of the word-processing system used, Microsoft Word 2016.

This the 18th day of May, 2021.

/s/ Erin Rust

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