

IN THE SUPREME COURT OF THE UNITED STATES

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No. 20-690

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MICHAEL SANG HAN,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in the above-captioned case contains 3,000 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 March 7, 2021.



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Kevin F. King