

No.:  

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In the Supreme Court of the United  
States

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**Phillip Blough**  
*Petitioner,*

v.

**The United States of America,**  
*Respondent.*

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On Petition for Writ of Certiorari to the U.S Court of  
Appeals for the Sixth Circuit

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**Certificate of Word Count Compliance**

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As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains 4394 words, 17 pages, excluding the pro-forma parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare so to the best of my knowledge and information.

Respectfully Submitted,

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I declare under penalty of perjury that the following is true and correct.

Executed on the \_\_\_\_ day of \_\_\_\_, 2021.

Notary Public: \_\_\_\_\_