

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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**LISA BERSHAN,**  
*Petitioner,*

vs.

**UNITED STATES OF AMERICA ,**  
*Respondent,*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Certiorari contains 5681 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 24, 2021.

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/s/  
JEREMIAH DONOVAN