

No. 20-7868

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IN THE SUPREME COURT OF THE UNITED STATES

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DOUGLAS KELLY  
Petitioner

v.

UNITED STATES OF AMERICA  
Respondent

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**CERTIFICATE OF WORD COUNT**

The undersigned hereby certifies that this Brief contains 276 words according to the Word Count feature in Microsoft Word, which is within the word limit set forth in Federal Rules.

/s/ John F. Yaninek

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