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December 16, 2020

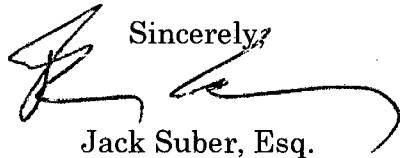
Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

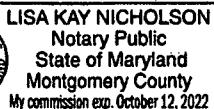
**RE: WARREN E. ROSENFELD V. UNITED STATES OF AMERICA**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains **8,732** 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.

  
Sincerely,  
Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 16th day of December 2020.

