

IN THE SUPREME COURT OF THE UNITED STATES

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No. 20-860

RYAN RANDALL GILBERTSON, PETITIONER

v.

UNITED STATES OF AMERICA

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,998 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

June 1, 2021