

IN THE  
**Supreme Court of the United States**

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MARK NORDLICHT; DAVID LEVY,

*Petitioners,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

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Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of Professor Jennifer L. Mascott as Amicus Curiae in Support of Petitioners contains 5720 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed May 4, 2022.

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/s/ Jennifer L. Mascott

Jennifer L. Mascott

*Counsel of Record*