

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

---

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

---

DAWN J. BENNETT,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

---

**On Petition for Writ of Certiorari to the  
United States Court of Appeals for the Fourth Circuit**

---

**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains no more than 2,000 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 July 12, 2021.

/s/Eric J. Brignac  
ERIC J. BRIGNAC  
CHIEF APPELLATE ATTORNEY  
OFFICE OF THE FEDERAL PUBLIC DEFENDER  
EASTERN DISTRICT OF NORTH CAROLINA  
150 Fayetteville St., Suite 450  
Raleigh, N.C. 27601  
(919) 856-4236  
Eric\_Brignac@fd.org

*Counsel for Petitioner*