

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

October Term, 2020

GABRIEL ELIJAH KANE ARKINSON,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 3,221 words, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 12th day of July, 2021.

Respectfully submitted,

/s/ MICHAEL DONAHOE
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