

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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JOHNNIE SIMS,  
*Petitioner,*  
v.

UNITED STATES OF AMERICA,  
*Respondent.*

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

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**CERTIFICATE OF WORD COUNT**

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NOW COMES Assistant Federal Public Defender Samantha J. Kuhn, court-appointed counsel for Petitioner Johnnie Sims, who hereby certifies pursuant to Supreme Court Rule 33.1(h) that the petition for writ of certiorari contains 5,823 words, excluding the parts of the document that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 29th day of October, 2021.

/s/ Samantha Kuhn  
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