

No. 21-\_\_\_\_\_

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

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ERNEST ROMOND GIBBS, JR.,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH  
WORD-LIMITATION RULE**

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I hereby certify that Mr. Gibbs's *Petition for Writ of Certiorari* contains approximately 3,879 words, according to Microsoft Word's word-count tool. Therefore, I have complied with the Court's word-limitation requirement set forth in Rule 33.1(g), (h).

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