

No. 21-_____

IN THE
Supreme Court of the United States

ERNEST ROMOND GIBBS, JR.,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

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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