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**In the
Supreme Court of the United States**

THOMAS H. OEHMKE,
Petitioner

v.

PATRICK ANDREW GUINAN
Respondent

Certificate of Word Count

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,139 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 December 1, 2021

/s/ Thomas H. Oehmke
Counsel of Record