

No. 21-852

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

CHRISTOPHER D. LISCHEWSKI,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

CERTIFICATION REGARDING BRIEF FORM

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I, Sharon Frase, hereby certify that the Brief of *Amici Curiae* Due Process Institute and The Cato Institute In Support Of Petitioner is proportionately spaced, has a typeface of 12 points, and contains 4,502 words, exclusive of those portions listed in Rule 33.1(d), as counted by the Word software program.

Respectfully submitted,

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