

IN THE SUPREME COURT OF THE UNITED STATES

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No.

GERALD G. LUNDERGAN, PETITIONER

v.

UNITED STATES OF AMERICA

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 7,883 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

December 22, 2021