

In the Supreme Court of the United States

No. _____

MONICA TOTH, PETITIONER,

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel Gedge, a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 8,955 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: August 26, 2022.

/s/ Samuel B. Gedge
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