

No. 22-23

IN THE
Supreme Court of the United States

JEAN FRANCOIS PUGIN,
Petitioner,

v.

MERRICK B. GARLAND, ATTORNEY GENERAL,
Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 17th day of March, 2023, that the Brief for Petitioner in the above-captioned case contains 12,996 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben

Michael R. Dreeben