

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

October Term 2022

MICHAEL DeFRANCE,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 2,976 words, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 1st day of March, 2023.

Respectfully submitted,

/s/ Michael Donahoe
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