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

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**DONALD V. WATKINS, SR.**  
Petitioner

v.

**UNITED STATES OF AMERICA**  
Respondent

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 5788 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the foregoing certification is true and correct.

Executed on this 3<sup>rd</sup> day of March, 2023.



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