

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

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No. 23-370

PAUL ERLINGER, PETITIONER

v.

UNITED STATES, RESPONDENT

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**CERTIFICATE OF WORD COUNT**

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I, Amy Mason Saharia, counsel for amicus curiae FAMM and a member of the Bar of this Court, certify that the amicus brief for FAMM in the above-captioned case contains 6,633 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Amy Mason Saharia  
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Amy Mason Saharia

January 10, 2024