

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

David Linehan,

*Petitioner,*

v.

United States of America,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Andrew B. Talai, hereby certify that the Petition for a Writ of Certiorari in the foregoing case contains 6,479 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 7, 2023.

/s/ Andrew B. Talai \_\_\_\_\_

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