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November 20, 2023

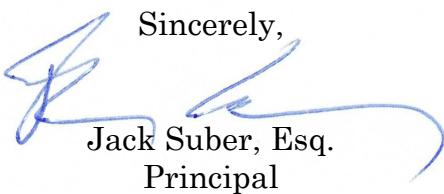
Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

RE: MICHAEL O'BANNON V. UNITED STATES

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari referenced above contains **2,794** 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.


Sincerely,
Jack Suber, Esq.
Principal

Sworn and subscribed before me this 20th day of November 2023.



