

SUPREME COURT OF THE UNITED STATES

No. _____

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ANDREW THOMAS COWHY,

Petitioner,

v.

MICHIGAN,

Respondent.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 1780 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 this 30th day of December, 2024.



Bryant Lee

Sworn to and subscribed before me on
this 30th day of December, 2024.



MARIANA BRAYLOVSKIY

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026