

No. 16-1348

IN THE

*Supreme Court of the United States*

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MICHAEL N. CURRIER,

*Petitioner,*

v.

COMMONWEALTH OF VIRGINIA,

*Respondent.*

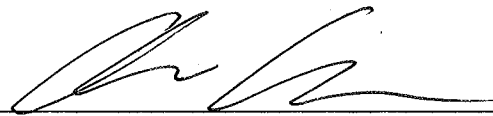
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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 5,014 words and complies with the word limitation established by Rule 33.1(g)(xi) of the Rules of this Court.

Dated: December 7, 2017



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David Debold