

In the Supreme Court of the United States

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ERIK LINDSAY HUGHES,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

I, Timothy S. Bishop, counsel for *amici curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief *Amicus Curiae* for Agricultural, Building, Forestry, Livestock, Manufacturing, Mining, and Petroleum Business Interests in Support of Petitioner contains 7,444 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

  
Timothy S. Bishop