

No. 17-155

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IN THE  
**Supreme Court of the United States**

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ERIK LINDSEY HUGHES,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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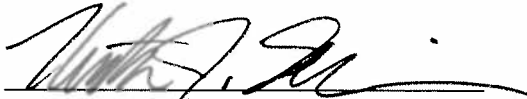
**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Amici Curiae of the National Association of Criminal Defense Lawyers and the National Association of Federal Defenders in Support of Petitioners in Harris v. United States, No. 17-155, complies with the word limitations, as it contains 8,089 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 29, 2018

  
Kenton J. Skarin