

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 17-155

Erik Lindsey Hughes,

*Petitioner,*

v.

United States of America,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Jean-Claude André, certify that the Brief Of Amicus Curiae Professor Douglas A. Berman In Support Of Petitioner in the foregoing case contains 4,389 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 January 29, 2018.

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