

IN THE SUPREME COURT OF THE UNITED STATES

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No. 19-783

NATHAN VAN BUREN, PETITIONER

v.

UNITED STATES

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for amici and a member of the Bar of this Court, certify that the Brief for the Reporters Committee for Freedom of the Press et al. as Amici Curiae Supporting Petitioner contains 4,601 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

July 8, 2020