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July 8, 2020

Clerk  
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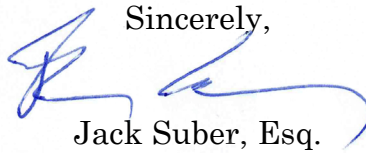
**RE NO. 19-783: NATHAN VAN BUREN V. UNITED STATES**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae The Markup* referenced above contains **6,894** 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.

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 8th day of July 2020.

