

IN THE
Supreme Court of the United States

XIULU RUAN,

Petitioner,

v.

THE UNITED STATES OF AMERICA,

Respondent.

SHAKEEL KAHN,

Petitioner,

v.

THE UNITED STATES OF AMERICA,

Respondent.

ON WRITS OF CERTIORARI TO THE
UNITED STATES COURTS OF APPEALS
FOR THE TENTH AND ELEVENTH CIRCUITS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 27th day of December 2021, that the Brief of the Chamber of Commerce of the United States of America as *Amicus Curiae* in Support of Neither Party in the above-captioned case contains 6,320 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben

Michael R. Dreeben