

In The
Supreme Court of the United States

DR. XIULU RUAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

**BRIEF FOR AMICUS CURIAE DUE PROCESS INSTITUTE
IN SUPPORT OF PETITIONER**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amicus Curiae Due Process Institute in Support of Petitioner in the above-referenced case contains 7,000 words, excluding the parts of the brief exempted by Supreme Court Rule 33.1(d)

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

Executed on December 27, 2021.

By  _____

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