

IN THE
Supreme Court of the United States

DEVON ARCHER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

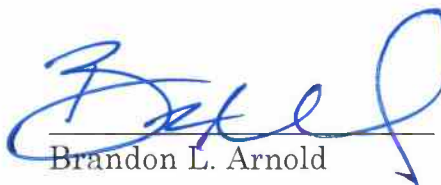
ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Procedure Scholars as *Amici Curiae* in Support of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 5,974 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word for Office 365) used to prepare the document.

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

Executed on June 25, 2021.



Brandon L. Arnold