

No. 20-____

IN THE
Supreme Court of the United States

ERICK ALLEN OSBY,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari to the
U.S. Court of Appeals for the Fourth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Easha Anand, certify that the document contains 8,991 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.

June 1, 2021

/s/ Easha Anand
Easha Anand