

No. 20-1693

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IN THE  
**Supreme Court of the United States**

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ERICK ALLEN OSBY,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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**On Petition for a Writ of Certiorari to the  
United States Court of Appeals  
for the Fourth Circuit**

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Jonathan Schneller, a member of the bar of this Court, certify on this 7th day of July 2021, that the Brief of the National Association of Federal Defenders and FAMM as *Amici Curiae* Supporting Petitioner in the above-captioned case contains 5,990 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jonathan Schneller  
Jonathan Schneller