

No. 20-1693

In the
Supreme Court of the United States

ERICK ALLEN OSBY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Christopher D. Man, certify that the accompanying *Amici* Brief of Former Federal District Court Judges and Law Professors in Support of Petitioner contains 3,278 words, including any footnotes and excluding the parts of the document exempted by Rule 33.1(d).

/s/ Christopher D. Man
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