

No. 20-291

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

JAMELL BIRT,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

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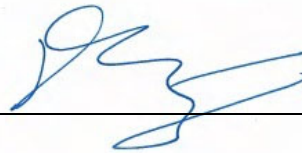
On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Third Circuit

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**CERTIFICATE OF COMPLIANCE**

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I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 5th day of October, 2020, that the Brief for the National Association of Criminal Defense Lawyers as Amicus Curiae Supporting Petitioner contains 4,694 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).



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