

No. 20-291
IN THE
Supreme Court of the United States

JAMELL BIRT,
Petitioner,

v.

UNITED STATES,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,973 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.

Executed on November 24, 2020.

/s/ Zachary C. Schauf
Zachary C. Schauf