

No. 20-306

IN THE
Supreme Court of the United States

ROBERT OLAN AND THEODORE HUBER,
Petitioners,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for a Writ of Certiorari
to the Court of Appeals for the Second Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 9th day of October 2020, that the Brief of Law Professors as *Amici Curiae* in Support of Petitioners in the above-captioned case contains 4,879 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben
Michael R. Dreeben