

IN THE
Supreme Court of the United States

UNITED STATES,
Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,
Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 7th day of December 2020, that the Brief in Opposition to Ceriorari in the above-captioned case contains 7,833 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jeffrey L. Fisher

Jeffrey L. Fisher