

No. 20-437

IN THE  
Supreme Court of the United States

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UNITED STATES,

*Petitioner,*

v.

REFUGIO PALOMAR-SANTIAGO,

*Respondent.*


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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for Former Executive Office of Immigration Review Judges as *Amici Curiae* in Support of Respondent contains 4,069 words and complies with the word limitation established by Rule 33.1(g)(xiv) of the Rules of this Court.

Dated: March 31, 2021

  
Richard W. Mark