

August 27, 2021

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

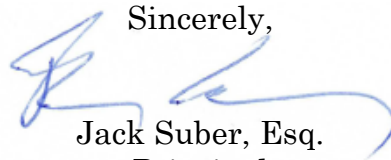
RE NO. 20-443: UNITED STATES V. DZHOKHAR A. TSARNAEV

Dear Sir or Madam:

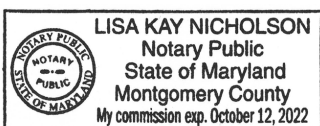
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Michael J.Z. Mannheimer referenced above contains **7,085** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.
Principal



ZRUD □ BEUEERUBW □ DB □ JW □

Lisa K Nicholson