

IN THE SUPREME COURT OF THE UNITED STATES

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No. 20-443

UNITED STATES OF AMERICA, PETITIONER

v.

DZOKHAR A. TSARNAEV

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Kannon K. Shanmugam, counsel for amici Retired Federal Judges and Former Federal Prosecutors and a member of the Bar of this Court, certify that the amicus brief in the above-captioned case contains 7,966 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

August 27, 2021