

No. 20-444

**In the Supreme Court of the United States**

United States,  
*Petitioner,*

v.

Michael Andrew Gary,  
*Respondent.*

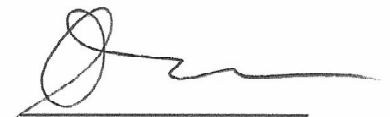
**On Writ of Certiorari to the  
United States Court of Appeals  
For the Fourth Circuit**

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Stuart Banner in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the Brief of Amicus Curiae contains 4,753 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.

Executed on March 22, 2021.



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