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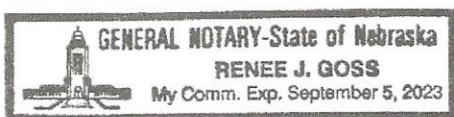
No. 20-444

UNITED STATES OF AMERICA,
Petitioner,
v.
MICHAEL ANDREW GARY,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICUS CURIAE NATIONAL ASSOCIATION OF FEDERAL DEFENDERS IN SUPPORT OF RESPONDENT in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 7289 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 25th day of March, 2021.
I am duly authorized under the laws of the State of Nebraska to administer oaths.



Renee J. Goss
Notary Public

Andrew H. Cackle
Affiant