

March 25, 2021

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

RE 20-444: UNITED STATES OF AMERICA V. MICHAEL ANDREW GARY

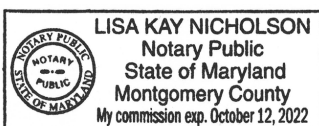
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Former United States District Court Judges referenced above contains **6,658** 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



RUD□ BEUEERUBW□ DBI□ ODUF□

Lisa K Nicholson