

No. 20-812

In the Supreme Court of the United States

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LISA FOLAJTAR.,

*Petitioner,*

v.

MERRICK B. GARLAND, ATTORNEY GENERAL et al.,

*Respondents.*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Third Circuit

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**Certificate of Word Count**

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Pursuant to S. Ct. R. 33.1(h), I hereby certify that the Brief of Neal Goldfarb as *Amicus Curiae* in Support of Respondents contains 5,534 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: March 12, 2021.

*/s/ Neal Goldfarb*

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