

SUPREME COURT OF THE UNITED STATES

No. 20-827

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UNITED STATES OF AMERICA,

PETITIONER,

V.

ZAYN AL-ABIDIN MUHAMMAD HUSAYN,  
A.K.A. ABU ZUBAYDAH, ET AL.,

RESPONDENTS.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5154 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 this 20<sup>th</sup> day of August, 2021.



\_\_\_\_\_  
Melissa Pickett

Sworn to and subscribed before me this 20<sup>th</sup> day of August, 2021.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2022