

In The
Supreme Court of the United States

XIULU RUAN,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Writ of Certiorari
to the United States Court of Appeals
for the Eleventh Circuit**

AMENDED CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PHYSICIANS AGAINST ABUSE IN SUPPORT OF PETITIONER contains corrected word count of 2,216 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 July 21, 2023.

/s/ Kevin J. O'Brien

Kevin J. O'Brien, Esq.

FORD O'BRIEN LANDY LLP
Supreme Court Bar # 154556
New York Bar # 1673847
275 Madison Floor 24
New York, NY 10016
Phone: 212-858-0040
Fax: 212-256-1047
Email: kobrien@fordobrien.com

*Counsel for Amicus Curiae
Physicians Against Abuse*