

## CERTIFICATE OF WORD COUNT

Case No. 23-1310

Case Name: *Dean Gross v. United States*

Title: Brief for Due Process Institute as *Amicus Curiae* in Support of  
Petitioner

Under Rule 33.1(h) of this Court's Rules, I certify that the accompanying Petition for Writ of Certiorari, which was prepared using Century Schoolbook 12-point typeface, contains 3,365 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared based on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is correct.

July 15, 2024

Respectfully submitted,

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