

No. 23-370

IN THE
Supreme Court of the United States

PAUL ERLINGER,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF WORD-COUNT

As required by Supreme Court Rule 33.1(h), I, Davina T. Chen, a member of the bar of this Court, certify on this 10th day of January, 2024, that the Brief of the National Association of Federal Defenders as *Amicus Curiae* in Support of Petitioner in the above-captioned case contains 6,640 words of text, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Davina T. Chen
Davina T. Chen