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March 4, 2026

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, D.C. 20002

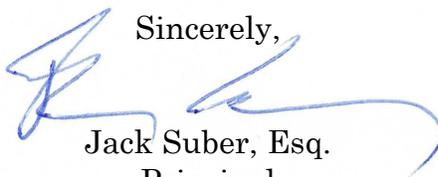
**RE: MICHAEL PRIME V. UNITED STATES**

Dear Sir or Madam:

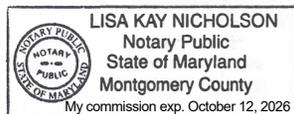
As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari referenced above contains **4,224** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 4th day of March 2026.

