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No. 25-528

In the Supreme Court of the United States

DAVID PAITSEL,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to S. Ct. R. 33.1(h), I certify that the brief of Huang Tiange as *amicus curiae* in support of Petitioner contains 5,174 words, excluding parts exempted by S. Ct. R. 33.1(d).

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

Executed on December 1, 2025

/s/ Huang Tiange
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President and Amicus Curiae
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