

In the Supreme Court of the United States

No.

MICHAEL J. MADIGAN, PETITIONER

v.

United States of America, Respondent

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 8,500 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt

LISA S. BLATT

July 27, 2026