No. 19-539 In The Supreme Court of the Hnited States

Office of Recovery Services,

Petitioner,

v.

JOHN R. LATHAM,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,148 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.

Executed on December 6, 2019.

John R. Blabha / ACB Ishan K. Bhabha