## CERTIFICATE OF WORD COUNT

No. 24-108

John Paul Salvador,

Petitioner,

v.

United States,

Respondents.

- $1.\ I$  am counsel of record for  $\ Amicus$  Curiae Central District Consumer Bankruptcy Attorney Association .
- 2. As required by Supreme Court Rule 33.1(h), I certify that the CENTRAL DISTRICT CONSUMER BANKRUPTCY ATTORNEY AMICUS BRIEF contains 3168 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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

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