No. 24-275

In the Supreme Court of the United States

DONTE PARRISH, Petitioner, v. UNITED STATES OF AMERICA, Respondents.

> On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

Certificate of Compliance

As required by Supreme Court Rule 33.1(h), I certify that I am a member of the bar of this Court and that the Brief of Bryan Lammon as Amicus Curiae Supporting Petitioner in *Parrish v. United States*, No. 24-275, complies with all word limitations, as it contains 3,756 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

Respectfully submitted,

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March 5, 2025