IN THE

Supreme Court of the United States

SEAN GARVIN,

Petitioner,

v.

NEW YORK,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE NEW YORK COURT OF APPEALS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Mark C. Fleming, a member of the bar of this Court, certify that the accompanying Brief for *Amici Curiae* National Association of Criminal Defense Lawyers and New York State Association of Criminal Defense Lawyers Supporting Petitioner contains 5,530 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on April 19, 2018.

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