## In the Supreme Court of the United States

KANSAS,

Petitioner,

v.

RAMIRO GARCIA, DONALDO MORALES, AND GUADALUPE OCHOA-LARA,

Respondents.

## CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for respondents and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Supplemental Brief contains 1,915 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,

Paul W. Hughes